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IN THE
Supreme Court of the United States
OCTOBER TERM, 1990

JAYNE BRAY, *et al.*,
Petitioners,
v.
ALEXANDRIA WOMEN'S HEALTH CLINIC, *et al.*,
Respondents.

On Writ of Certiorari to the United States Court of Appeals for the Fourth Circuit

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BRIEF OF 29 ORGANIZATIONS COMMITTED TO WOMEN'S HEALTH AND WOMEN'S EQUALITY AS *AMICI CURIAE* IN SUPPORT OF RESPONDENTS

(List of *Amici Curiae* on Inside Cover)

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AMICI CURIAE

The National Abortion Rights Action League Foundation
Abortion Rights Council of Minnesota
American Association of University Women
American Medical Women's Association, Inc.
B'nai B'rith Women
California Women Lawyers
Catholics for a Free Choice
Center for Women Policy Studies
Coalition of Labor Union Women
Equal Rights Advocates, Inc.
Feminist Majority Foundation
Lambda Legal Defense and Education Fund, Inc.
Mexican American Women's National Association
National Association of Commissions for Women
National Black Women's Health Project
National Council of Jewish Women
National Federation of Business and Professional Women's Clubs, Inc.
National Institute for Women of Color
National Women's Conference Committee
National Women's Health Network
National Women's Party
National Women's Political Caucus
Northwest Women's Law Center
Voters for Choice
Women's International League for Peace and Freedom
Wider Opportunities for Women
Women's Medical Fund, Inc.
Yale Journal of Law and Feminism
Zero Population Growth

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(List of *Amici Curiae* on Inside Cover)

INTEREST OF *AMICI CURIAE*

Amici curiae are organizations that are committed to women's health and women's equality. We share a common concern for the protection of women's constitutional and statutory rights, including the constitutional right to travel and the constitutional right to reproductive autonomy.

In an effort to bring to the Court's attention the perspectives of the women who have been the targets of petitioners' conspiracy to deprive them of their constitutional rights, *amici curiae* have collected letters from women and their supporters, including physicians, clinic staff

and volunteer clinic escorts, who have been subjected to the use of force, violence and intimidation by those who, like petitioners, participate in blockades of abortion clinics.[1] These letters graphically illustrate that the motivation behind petitioners' conspiracy is to deprive women of the equal protection of the law and the equal privileges and immunities under the law.

The more specific interests of each of the organizations that have joined together here as *amici curiae* are set forth in Appendix A.[2]

SUMMARY OF ARGUMENT

This case arises out of petitioners' conspiracy to engage in physical blockades that prevent women from obtaining health care at certain medical clinics that provide abortion and related services including counseling and information concerning abortion. The purpose of petitioners' conspiracy is to deprive women, through force, violence, and intimidation, of the equal protection of the laws and equal privileges and immunities under the law. Consequently, because the animus or motivation behind this conspiracy is to deprive a protected class of their equal rights, petitioners' conspiracy falls squarely within the scope of activity proscribed by 42 U.S.C. § 1985(3).

The extensive excerpts from letters by women seeking to exercise their rights and physicians and volunteer clinic escorts who seek to help those women, demonstrate that petitioners' conspiratorial purpose is to deprive women of the equal protection of the laws. As one letter stated,

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[1] These letters have been lodged with the Clerk of this Court. Letters quoted in this brief will each be referenced by a number, preceded by the letter "C" (e.g.: "C1") and the texts of all letters quoted herein are reproduced in full in Appendix B.

[2] *Amici curiae* file this brief with the consent of all parties and letters of consent have been filed with the Clerk of the Court pursuant to Rule 36.

> I am convinced that the agenda of Operation Rescue and similar organizations is not to exercise free speech, rather it is to bully and intimidate women from utilizing clinic services . . . . Physical intimidation and verbal assault are the primary tools employed against women . . . . C14.

In some cases, those blockading the clinics are successful in preventing women from entering the clinics:

> I also remember the faces of patients arriving for appointments, seeing the blockades and having to react immediately. These were women's faces showing fear and confusion, panic and crisis. If they summoned all their courage and tried to get inside, with the help of escorts, O.R. [Operation Rescue] still pursued them, chasing, yelling and grabbing. Many women simply turned around and went home. C74.

These letters describe the physical obstacles erected by petitioners' blockades faced by women seeking to enter the clinics.

> Far from being a peaceful demonstration of opposition to abortion, Operation Rescue physically blocked access to allow anyone to enter the clinic. The group was overwhelmingly made up of men whose presence intimidated anyone who sought entrance to the clinic. C73.
>
> I remember O.R.'s [Operation Rescue] pushing and shoving and kneeing and elbowing, as they charged in large numbers through and over lines of pro-choice volunteers toward clinic doors and entranceways. C74.

The letters also describe the intimidating and violent nature of the acts undertaken by petitioners and others who attempt to close down clinics in furtherance of the conspiracy against women. At a blockade in Texas,

> [T]he rescuers completely blocked the front door . . . . A clinic worker had to get out of the building so she could give the trespass warning, as is required by Texas law. We went to the back door . . . . A

group of rescuers blockaded that door as well. When we opened the door so the clinic worker could get out, they attempted, by main force, to shove their way through the door so they could get to the clinic. We managed to prevent this, but I was bruised up pretty thoroughly and got my shoulder strained so severely that a doctor's care was required. C38.

As one woman who was confronted with a blockade when she arrived at a clinic to have an abortion said, "There is absolutely no excuse for the hostile, intimidating behaviors that these anti-choice protestors direct towards women seeking abortions." C61.

ARGUMENT

I. WOMEN ARE MEMBERS OF A VALID CLASS PROTECTED UNDER 42 U.S.C. § 1985(3).

A. A Sex-Based Class Satisfies The Statute's Class Requirement.

As respondents persuasively argue in their brief to this Court, both the broad language of the statute and the statute's legislative history support a finding that women form a cognizable class under 42 U.S.C. § 1985(3).[3] Indeed, petitioners do not challenge this interpretation.

Nothing in the language of the statute limits its application only to African-Americans or other racial classes. To the contrary, the statute employs broad language, extending protection to "any person or class of persons" who are the subject of private conspiracies to deprive them of the equal protection of the laws. Moreover, as

[3] As discussed in respondents' brief, this Court, in *Griffin v. Breckenridge*, interpreted the statutory requirement that the conspiracy must be formed "for the purpose of depriving, either directly or indirectly, any person or class of persons of the equal protection of the laws, or of equal privileges and immunities under the laws," to mean that the conspirators' action must be motivated by a "class-based invidiously discriminatory animus." 403 U.S. 88, 102 (1971).

respondents demonstrate, the legislative history of 42 U.S.C. § 1985(3) reveals that Congress contemplated classes of people not specifically identified at that time, such as women, as people who might be subjected to a conspiracy motivated by class-based discrimination to interfere with their rights. All seven of the United States Courts of Appeals that have considered the issue have held that women are a class protected by this statute.[4] This Court has previously assumed, without deciding, that sex—an immutable characteristic like race—is a valid basis for identifying a class protected under section 1985(3). *Great Am. Fed. Savings & Loan v. Novotny*, 442 U.S. 366 (1979); *see id.* at 389 n.6 (White, J., dissenting).

B. Petitioners' Conspiracy Interferes With Rights Possessed By Potentially All Women.

The ultimate goal of petitioners' conspiracy is to prevent women from exercising their legal rights, including the right to travel anywhere in the United States[5] in order to obtain necessary medical care including abortions and related services.[6] Petitioners and the United

[4] *New York State NOW v. Terry*, 886 F.2d 1339 (2d Cir. 1989), *cert. denied*, 110 S. Ct. 2206 (1990); *Volk v. Coler*, 845 F.2d 1422 (7th Cir. 1988); *Long v. Laramie County Community College*, 840 F.2d 743 (10th Cir.), *cert. denied*, 488 U.S. 825 (1988); *Stathos v. Bowden*, 728 F.2d 15 (1st Cir. 1984); *Life Ins. Co. of N. Am. v. Reichardt*, 591 F.2d 499 (9th Cir. 1979); *Novotny v. Great Am. Fed. Savings & Loan Ass'n*, 584 F.2d 1235 (3d Cir. 1978) (*en banc*), *vacated on other grounds*, 442 U.S. 366 (1979); *Conroy v. Conroy*, 575 F.2d 175 (8th Cir. 1978).

[5] *Amici curiae* agree with respondents that the Court need not reach respondents' claim concerning the deprivation of their right to privacy, and that a remand for consideration of this issue may be appropriate if the Court deems consideration of that issue necessary.

[6] Throughout the history of abortion services in the United States, women have been forced to travel interstate to obtain abortions, both during the era when abortion was illegal in many states, before

States erroneously assert that this conspiracy is not discriminatory because the blockades merely have a "disproportionate effect on women."[7] Petitioners' blockades, however, constitute deliberate, not somehow accidental, interference with women's exercise of their rights, and they deliberately interfere, not just "disproportionately," but exclusively with the constitutional rights of women.[8] The class targeted by petitioners' conspiracy is, therefore, clearly sex-based.

Roe v. Wade, 410 U.S. 113 (1973), and continuing today. In recent years, an increasing shortage of abortion providers has required more and more women to travel to other states to obtain abortion services. Thirty-four states suffered a decrease in the number of abortion providers between 1985 and 1988. According to a report published in 1990, as of 1988, no physician performed abortions in eighty-three percent of counties in the United States. In some states, such as North Dakota and South Dakota, only one abortion provider remains statewide. As a result, many American women live hundreds of miles from the nearest provider. Henshaw and Van Vort, *Abortion Services in the United States, 1987 and 1988*, 22 Fam. Plan. Persps. 102 (May/June 1990); S. Henshaw, J.D. Forrest and J. Van Vort, *Abortion Services in the United States, Each State and Metropolitan Area, 1984 and 1985* 100-105 (1987), and additional unpublished data from the Alan Guttmacher Institute. The harassment, blockades, and violence engaged in by petitioners and other similar organizations are contributing factors to this dramatic and dangerous decline in the availability of abortion services. *See* Letter C62 in Appendix B.

[7] Brief for the United States as *Amicus Curiae* at 6.

[8] The fact that doctors, clinic administrators, clinic employees, and volunteer clinic escorts are also targets of petitioners' conspiracy does not detract from the argument that the class is women, nor does it detract from the argument that petitioners are motivated by a sex-based animus. The animus of petitioners is to deprive members of the class—women—of their constitutional rights. The other individuals are present, and petitioners confront them, because they are actively supporting women in the exercise of the rights with which petitioners seek to interfere. The legislative history of the statute and the prior decisions of this Court make clear that the fact that conspirators target "supporters" of the members of the class is not inconsistent with a showing that the conspirators have the requisite class-based animus. *United Bhd. of Carpenters & Joiners of Am. v. Scott*, 463 U.S. 825, 836 (1983).

Petitioners misconstrue the class that respondents have identified, incorrectly identifying it as "women seeking abortions." Respondents have clearly alleged that the class for whom protection is sought under section 1985(3) in this case is women, and the nature of the conspiracy in which petitioners are engaged supports this definition of the class.[9] Petitioners misleadingly label the alleged class in an attempt to imply that it is merely a "sub-class" of women.[10] The reality is that the vast majority of women may, at some time in their lives, require the medical services—including abortions, pregnancy options counseling, and related services—that petitioners seek to deny women. The availability of counseling and information about abortion services is critical to women's ability to protect their physical well-being and make decisions about their health care, based upon an understanding of the complete range of reproductive options.

The constitutional rights infringed by petitioners' conspiracy extend to all members of the class. All women of childbearing capacity may, at some time, require the types of services of the health care clinics that are blockaded by petitioners. Consequently, all women are targets of petitioners' conspiracy to deprive women of their equal rights under the law.[11] Petitioners' conspiracy

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[9] Alternatively respondents allege a class of "women who seek the services of providers of abortion and related services," which accurately identifies the women who are the direct and immediate victims of petitioners' conspiracy. As discussed below, the alternative class is essentially all women and is therefore, in relevant respects, indistinguishable from the class of women.

[10] Brief for Petitioners at 17.

[11] It is not relevant to the definition of the class that a small fraction of women—estimated at 8.4 per cent—may be infertile. *Research Refutes Perceived "Infertility Epidemic,"* Wash. Post, Dec. 7, 1990, at A-11 (citing W. Mosher & W. Pratt, *Fecundity and Fertility in the United States, 1965-88*, National Center for Health Statistics, Advance Data, No. 192 (Dec. 4, 1990)). On the con-

is not directed only at the particular women seeking access to a particular clinic on a given day, but is designed ultimately to stop all women who at any time may wish to exercise their right to travel to seek abortion services or information related to abortion and medical options during pregnancy.

That all members of a class are not presently seeking to exercise their rights is irrelevant. Although not all women are currently seeking employment in battery factories, a policy that discriminates in hiring for such jobs on the basis of women's childbearing capacity nonetheless discriminates against women as a class.[12] Similarly, the fact that not all African-Americans seek to exercise their right to decide to marry a person of another race, in no way detracts from this Court's holding that a racial classification, such as the classification in the Virginia statute challenged in *Loving v. Virginia*, violates the equal protection clause.[13] Therefore, notwithstanding the fact that not all women are pregnant at any given time, and not all women simultaneously seek the care of providers of abortions and related services, all women possess the right to travel to seek such services, and women as a class are the direct targets of petitioners' conspiracy to deprive them of that right.[14]

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trary, many women thought to be "infertile" seek medical treatment that includes extensive testing, monitoring, and counseling, and are ultimately able to conceive.

The fact that a small percentage of the members of the class may actually be irreversibly infertile does not undermine the existence of the class. This court in *Johnson Controls* recently recognized that a company policy that discriminated against women of childbearing capacity constituted discrimination on the basis of sex under Title VII. *International Union v. Johnson Controls*, 59 U.S.L.W. 4209 (U.S. Mar. 20, 1991).

[12] *Johnson Controls*, 59 U.S.L.W. at 4212.

[13] *Loving v. Virginia*, 388 U.S. 1 (1967).

[14] The Solicitor General's extensive discussion of a footnote in *Geduldig v. Aiello*, 417 U.S. 484 (1974), is entirely irrelevant to

The vast majority of women become pregnant at least once during their lives. More than eight out of ten women will have at least one child by the end of their childbearing years,[15] and an estimated two-thirds of American women will have at least one unintended pregnancy in the course of their lives.[16] In any single year, more than six million women (eleven per cent of those of reproductive age) become pregnant, and 3.4 million of

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respondents' claim that petitioners' conspiracy is deliberately aimed at depriving women of their equal right to travel. Moreover, the issues presented in this case are of statutory, not constitutional, interpretation. In interpreting Title VII of the Civil Rights Act of 1964—another statute protecting women from sex discrimination—this Court recently held that an employment policy that excluded women of childbearing capacity from certain jobs was "a facial classification based on gender." *Johnson Controls*, 59 U.S.L.W., at 4211.

[15] U.S. Bureau of the Census, *Fertility of American Women: June 1988, Current Population Reports, Series P-20, No. 436*, at 17 (1988).

[16] Forrest, *Unintended Pregnancy Among American Women*, 19 Fam. Plan. Persps. 77 (Mar./Apr. 1987). According to a 1982 survey, 65 per cent of women between the ages of 40 and 44 have had at least one unintended pregnancy. *Id.* This extraordinarily high rate of unintended pregnancy is attributable primarily to the high failure rates of existing methods of contraception, the unavailability of certain contraceptives, and the lack of sex education. For example, during the first year of using the method, approximately one out of every seven women using a diaphragm or condom as a method of birth control will become pregnant; similarly, one out of sixteen women relying upon oral contraceptives will become pregnant. *See* Jones & Forrest, *Contraceptive Failure in the United States: Revised Estimates from the 1982 National Survey of Family Growth*, 21 Fam. Plan. Persps. 103, 109 (May/June 1989). Moreover, many existing methods of contraception present significant health risks that make them medically inappropriate for many women. Finally, abstinence and sterilization do not serve all women at all stages of their reproductive lives. Abstinence during the 40 or more years a women is fertile is not a viable way of life for most women, and sterilization, while effective, requires women to sacrifice childbearing permanently, rather than exercise their interest in procreative choice.

these are unintended pregnancies.[17] Each year 3.7 million American women give birth.[18]

Many women who had not previously considered having an abortion may at some point need information or counseling about abortion services and related testing and services. Many women experience health problems associated with their pregnancies. Of every ten women who become pregnant and bear a child, six are treated for some medical complication during pregnancy, and three are treated for major complications.[19] The onset or worsening of a disease or medical condition may create a need for a woman to consider having an abortion, even in cases in which the pregnancy was wanted and planned. Among the medical conditions that present increased risks to women's health during pregnancy—sometimes to the point of threatening the woman's life—are preeclampsia, cardiovascular disease, cancer (including cervical, ovarian and breast cancer), high blood pressure, kidney disease, immunological disorders, asthma, diabetes, systemic lupus erythematosus, and acquired immunodeficiency syndrome (AIDS).[20] Moreover, a woman contemplating becoming pregnant who suffers from one of these conditions may need medical care that includes counseling about the full range of reproductive options, including abortion, even before becoming pregnant.

Among the letters that *amici* have collected describing instances in which clinic blockades have interfered with

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[17] R. Gold, *Abortion and Women's Health* 11 (1990).

[18] Alan Guttmacher Institute, *Blessed Events and the Bottom Line: Financing Maternity Care in the United States* 5 (1987) (citing U.S. Bureau of the Census, *Fertility of American Women: June 1985, Current Population Reports, Series P-20, No. 406*, 8-9 (1986)).

[19] *Id.* at 10.

[20] F. G. Cunningham, P. MacDonald, N. Gant, *Williams Obstetrics*, 659, 796, 806, 813, 816-17, 836-37, 858, 859-61 (18th ed. 1989); N. Hunter, *Position Paper/Time Limits on Abortion*, in Reproduction Laws for the 1990s: A Briefing Handbook 110 (1988).

women's ability to exercise their rights, several recount compelling experiences that demonstrate that any woman may discover, in the course of a pregnancy, that she requires abortion services or counseling. One woman suffered from diabetes and risked losing her life if she did not terminate her pregnancy:

> [A] tearful woman and her husband . . . had been waiting in vain for the protestors to disperse. [The woman] was diabetic and had been advised by her doctor that an abortion was medically necessary. To carry the pregnancy to term would likely cost the woman her life, and she had made the decision to abort, thinking of her husband and three children. C27.

Several women sought abortions in cases involving severe fetal anomalies:

> The woman was carrying a fetus which, through amniocentesis, was determined to be without kidneys. Their doctor told them that the fetus probably would not survive delivery, but would definitely not be able to survive on its own. Because protestors were sitting in front of [the clinic] doors, [clinic staff members] pulled the couple over the protestors and through the doors. You could see the shock and despair, especially on the husbands [sic] face, who by now, was in tears. They told me that they wanted to have children, but under the circumstances, felt terminating the pregnancy at that point was the best thing. The people blocking the doors just made a very difficult experience even more traumatic. C26.
>
> We had to encircle a woman who was being harassed until she was sobbing uncontrollably. She explained to us that she was only getting an abortion because she had taken accutane which causes birth defects. There was also a laminaria patient who had to have her abortion completed that day or she could have had serious complications. C62.

The letters also recount the experiences of women who suffer from medical problems that require testing, moni-

toring and specialized prenatal care, and who may at some point require counseling from a physician who is able to address the full range of reproductive options, including abortion.

> I was having a lot of problems with hypoglycemia during my pregnancy with terrible headaches occurring when I didn't eat. . . . After going through not eating, drinking high-sucrose liquid, the beginnings of a migraine and no sleep (not to mention being 7 months pregnant) this confrontation brought me to tears. . . . We had made a Saturday appointment specifically to discuss some important issues with my doctor, but due to the circumstances [of a clinic blockade], it did not seem appropriate to bring these issues up at this time. He was visibly upset by this demonstration. This affected our doctor-patient relationship. After the test and my exam[,] my husband, girlfriend and I approached the back exit to leave. By this time there were lots of protesters outside. All three entrances were blocked by approximately 20 people each. I tried to open the door and they wouldn't move. They looked at us and started singing Christian hymns. . . . I just stood there amazed, I couldn't believe they were imprisoning us inside the building. . . . I was feeling fairly shaky and starting to be lightheaded by this point. The nurse offered me some tea, which I declined because I didn't want the caffeine, and I asked if they had any crackers. She got me some water and triscuits. I returned to the waiting room to wait and eat and try and deal with the anger I was feeling. I couldn't eat much because my stomach was so tied up in knots and the food was making me sick. My doctor was concerned about me and he offered to call an ambulance for me . . . . C12.

Women decide to have abortions for a wide array of compelling and complex reasons not only related to their physical health, but also based on their obligations to their families, their deeply personal religious and moral values, and their overall life situations and responsibili-

ties.[21] If current abortion rates continue, forty-six per cent of women currently of childbearing age will have had at least one abortion by age forty-five.[22] Each year approximately three percent of American women have abortions.[23]

Far from affecting only a small "sub-class"[24] of women, conspiracies to interfere with abortion services including counseling and information thus directly affect the rights of all women, including those who may never choose to have an abortion, as well as the many women who do seek abortions and related services.

II. PETITIONERS' ACTIONS ARE MOTIVATED BY A SEX-BASED ANIMUS DIRECTED AT WOMEN.

A. Sex-Based Animus Requires An Aim To Deprive Women Of The Equal Enjoyment Of Their Legal Rights.

As respondents persuasively argue, petitioners' conspiracy is driven by a "class-based, invidiously discriminatory animus" as required under section 1985(3). *Griffin*, 403 U.S. 88, 102 (1971). Petitioners and the

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[21] In addition, women who are the victims of rape and incest may choose to have abortions if they become pregnant as a result of these crimes. For a full discussion of the many reasons women may decide to have abortions, illustrated in excerpts from the letters of individual women recounting their personal experiences with abortion, *see* Brief for the *Amici Curiae* Women Who Have Had Abortions and Friends of *Amici Curiae* in Support of Appellees, *Webster v. Reproductive Health Services*, 109 S. Ct. 3040 (1989) (No. 88-605).

[22] Forrest, *Unintended Pregnancy Among American Women*, 19 Fam. Plan. Persps. 77 (Mar./Apr. 1987).

[23] In 1987, the United States abortion rate was 27 abortions for every 1000 women of childbearing age. Henshaw, Koonin & Smith, *Characteristics of U.S. Women Having Abortions, 1987*, 23 Fam. Plan. Persps. 75, 76 (Mar./Apr. 1991).

[24] Brief for Petitioners at 17.

United States as *amicus curiae* in support of petitioners misstate the animus requirement when they argue that Operation Rescue is not motivated by "hostility toward women," [25] or "animosity toward women." [26] No such "hostility" or "animosity" is required, nor is support for such a requirement cited by either petitioners or the United States. To the contrary, this Court emphasized that the requirement of animus is a requirement of "motivation" and that the conspiracy "must aim at a deprivation of rights secured by the law to all." [27] The aim of petitioners' conspiracy is to deprive women of their "rights secured by the law to all," including their right to travel to obtain necessary and protected health care, by physically barring women's movement.

Respondents' comparison of the conspiracy alleged in this case to the conspiracy alleged in *Griffin*, and deemed sufficient by this Court to satisfy the animus requirement, is compelling. In *Griffin*, as here, the purpose of the conspiracy "'was to prevent [the] plaintiffs . . . through . . . force, violence and intimidation, from seeking the equal protection of the laws and from enjoying the equal rights, privileges and immunities of citizens under the laws of the United States and the [states].'" 403 U.S. at 103. The Court concluded that "[t]hese allegations clearly support the requisite animus to deprive the petitioners of the equal enjoyment of legal rights because of their race." *Id.* In this case, petitioners' goal is to prevent women, and only women, from

[25] Brief for Petitioners at 20.

[26] Brief for the United States as *Amicus Curiae* at 14.

[27] This Court specifically limited the meaning of the "animus" requirement for the purposes of this statute to "invidiously discriminatory animus," and not "scienter in relation to deprivation of rights." The "animus" requirement does not incorporate a requirement of "willfulness," and "must not be confused with the test of 'specific intent to deprive a person of a federal right made definite by decision or other rule of law.'" *Griffin v. Breckenridge*, 403 U.S. at 102 n.10.

freely exercising their rights under current law. Thus, petitioners' conspiracy is based upon the requisite class-based discriminatory animus under the statute.

B. The Activities In Which Operation Rescue Engages Demonstrate That The Conspiracy Is Aimed At Depriving Women Of Their Rights.

Petitioners erroneously assert that the question presented in this case is whether "opposition to abortion, standing alone, . . . translate[s] into sex discrimination." [28] Neither respondents nor the lower courts have suggested that opposition to abortion, without more, constitutes discrimination against women. Petitioners' mischaracterization ignores a fundamental distinction between the physical blockades in which petitioners engage and "opposition to abortion, standing alone." Petitioners possess and act on the requisite class-based animus because they purposefully engage in concerted, mob action to prevent women from exercising their legal rights.

That petitioners' aim is to prevent women from equally exercising their legal rights is vividly conveyed in the voices of individuals who have related their personal experiences at clinic blockades in letters collected by *amici curiae*. These letters describe the various actions clinic blockaders undertake in their efforts to prevent women from obtaining medical care. Petitioners, unlike many people who oppose keeping abortion legal and who seek to change the law through legislation, litigation, and other forms of social and political activism, are motivated by a determination to deprive women of their rights under existing law through any means available including physical confrontation, terrorism, violence and trespass. One clinic volunteer described the terrorist tactics used by the blockaders:

> The windows in the clinic have been shot out three different times during the night and it is also frightening to arrive in the morning to find windows shat-

[28] Brief for Petitioners at 19.

> tered by bullets and bullets lodged in the walls. . . . [T]he building has been covered with red paint, eggs have been thrown all over the building and the parking lot. C29.

Petitioners' blockades are not, and are not intended to be, peaceful attempts to "persuade," "discourage," and "dissuade" women from having abortions.[29] Rather, petitioners' clear motivation is to deprive women of the opportunity to exercise their rights and enjoy the equal protection of the laws, by physically impeding women's freedom of movement. In the words of one clinic employee, the protesters will "stop at nothing to prevent women from exercising their legal rights." C22. Far from engaging in peaceful sit-ins, demonstrations or other acts of persuasion, petitioners frequently resort to unlawful means— including "force, intimidation and violence" [30]—to exert control over women's reproductive decisions.

A tactic employed in virtually every clinic blockade is for the blockaders to form a barricade in front of the doors to the clinic so that women cannot enter or leave.

> At 7:30 A.M., approximately 350 people came marching toward my building in block formation, about twelve abreast. I met them at the property boundary with two private security guards and said what the police had instructed me to say. What a joke—not a funny one either. The mob pushed me all the way to the front door of the clinic and proceeded to

[29] Brief for Petitioners at 20; Brief for the United States as *Amicus Curiae* at 14. Both petitioners and the United States place misleading and unwarranted emphasis on the facts recited in *Mississippi Women's Medical Clinic v. McMillan*, 866 F.2d 788 (5th Cir. 1989). Unlike the conspiracy that is the subject of this litigation, the allegations in *Mississippi Women's Medical Clinic* involved only picketing and attempts at persuasion. Here, by contrast, the petitioners' purpose is to interfere with women's exercise of their rights through intimidation and physical obstruction of their freedom of movement.

[30] *Griffin*, 403 U.S. at 103.

> pin me and the guards against the brick wall and door. There were thirteen female employees now trapped in the building. More of the group went and blocked the two back doors. C33.

Another letter described how the blockades extend to the sidewalks around the clinic and into the streets to interfere with traffic.

> Ingress and egress to the clinic is often impeded by protesters physically blocking the sidewalk or driveway. The most frequent targets for these actions are women walking or driving alone. I have seen protesters place themselves prone in the drive or public street in front of moving cars forcing the drivers to stop. C47.

The force and physical obstructions are not limited to the clinic entrances and surrounding sidewalks. Blockaders often try to shove through the doors in order to invade and occupy the clinic, recognizing that once they break through the doors, they can more effectively put a halt to the provision of medical services. At a clinic in Vermont, patients and staff were held hostage for hours inside waiting and examination rooms before the police could remove "the intruders who had bicycle locked their necks together."

> Once the locked door was open, 39 men and 13 women charged out of a moving van and stormed into the [Women's Health Center], knocking me to the waiting room floor. While I was trying to reach the telephone, a man bodily trapped me while I watched hordes of people invade the building. I feared for the safety of the staff. I envisioned the damage and destruction to our property. . . . A patient was trapped in the counseling room adjoining the occupied hallway. She had come to the Health center that day for further screening of an abnormal pap smear to determine if she had cervical cancer. Staff was unable to reach her. She was alerted through the intercom that the building had been invaded and that the police were on their way. . . . It

took 6 hours to remove the intruders who had bicycle locked their necks together. As [ ] police attempted to remove these people, they struggled. Two policemen were injured in the process. Others were called Nazis. . . . Over the long hours of that afternoon I personally endured vicious name[-]calling and was subjected to their hateful behavior. A man calling himself Father Baby John Doe kicked me. I felt violated and assaulted . . . . C5.

As [the assistant director of the clinic] opened the heavy, steel firedoor, I heard her scream. Seven protesters had thrown their full body weight against the door to prevent the doctor's entrance. In the process, they had pinned the assistant director in the door and she was being crushed by the combined weight of the door and the people pressing against it. I wedged myself between her and the door in an effort to gain some leverage and relieve the pressure on her. She was freed, the door was opened a bit more and the protesters grabbed my ankle and pulled me to the ground. I landed on my knee and twisted it badly. I was half in and half out of the building, and I was crying and begging them to let go of me because I was injured. . . . Nobody moved, despite the fact that I was obviously hurt. C40.

In addition to physical obstruction, blockaders use fear tactics and emotional coercion to terrify women out of exercising their legal rights. In the words of one victim, in order to bar access to medical facilities that provide abortion services, they "bully and intimidate women from utilizing clinic services." C14. One person remarked, "[H]aving to fight your way through people trying to block your access to health care is not only a draining ordeal physically, but emotionally, as well." C44. And as one employee in a doctor's office explained, "I can't count the number of times I've seen a patient came [sic] in crying, near hysteria, totally initimidated [sic] by the OR [Operation Rescue] picketers." C4.

In their effort to interfere with women's ability to exercise their rights through provoking fear and anxiety,

blockaders often focus their verbal harassment specifically at women seeking to enter the clinics. One such tactic is to bombard the woman with a series of very intrusive and personal questions.

> Physical intimidation and verbal assault are the primary tools employed against women by anti-abortion groups. They refrain from accosting men on public streets to demand personal information on pregnancy status, marital status, religion, or his sex life. Instead they assail women. . . . The privacy and dignity of women is completely disregarded with every clinic blockade. That this kind of behavior is condoned is unacceptable; that women specifically must bear the rage and contempt of Operation Rescue should no longer be endured. C14.

Decisions about pregnancy, abortion, and childbearing are intensely personal, and the threat of exposure is terrifying to many women. Tactics that play on the fears of women seeking medical care at the clinics are not unusual. One escort remarked that a blockader "writes down the license tag numbers from all the cars parked in the clinic parking lot. Some of the clients who come from small towns are intimidated by this." C33. One escort tells of a woman who "demanded that a client parking in the clinic lot produce some identification. The client told us later she had no idea who [the protestor] was, but assumed she was someone in authority[. W]hen an escort came up to the car and the protester retreated the client was still fumbling in her wallet and said 'Here's the I.D. that woman wanted.'" C37.

One of the most invidious tactics has been the use of photography and videocameras to invade the privacy of women entering the clinics and to intimidate them out of exercising their rights. One volunteer clinic escort recounts that "one of [the blockaders] usually has a camcorder and videotapes patients. This is one of the most intrusive and upsetting things I have seen so far. The patients are afraid that they will see themselves on television, maybe on the evening news!" C62.

> [Clinic blockaders] photograph[] each patient as she goes in the abortion clinic. I actually saw one protestor continue to photograph two women even after the women had told him to NOT take their picture. . . . the protestor, after being told to not take the ladies[']picture, smirked as he continued to take snapshots. C2.

In at least one case, the result of the photographic record was tragic:

> I have observed anti-abortion picketers photographing all people who enter clinics. I know of one particular instance in which an anti recorded the license plate number, got the name of the owner, and called to preach on the evils of abortion. Sadly, the person who owned the car was the mother of a woman who had not confided her pregnancy to her family. . . . [This event] temporarily destroyed the relationship between mother and daughter. The daughter had been impregnated by the mother's boyfriend . . . [who] had taken advantage of her when she arrived home in a drunken state. C3.

In their attempts to obstruct women from entering clinics, the blockaders will torment even small children. In one incident,

> [The clinic blockaders] showed no respect even for very small children. A mother with her two children were simply walking by the clinic and came up to find out what was going on when the O.R. [Operation Rescue] people shouted at the woman and showed bloody pictures to her children who were horrified. C9.

In another episode, "[o]ne man yelled at a black woman, 'You bitch . . . they're going to kill your little black baby.' If a woman has a child with her, they will say, 'What a beautiful baby. Do you want to kill this one too?'" C1.

One clinic escort described an experience in which,

> [A] woman in the company of her two children approached the clinic. They were met by a frenzy of hostile picketers who shoved at them photographs of what they claimed were aborted fetuses and screamed at the mother, 'Don't kill your baby!' The fact that the woman was there to see the children's dentist did not phase the picketers and they continued to harass and block her entrance to the clinic. . . . [O]nce inside, the children were hysterical, crying out, 'Mommy, don't kill us!' C8.

In addition to verbal harassment, threats of physical violence play an important role in the methods used by petitioners and other blockaders to intimidate women and to frustrate the efforts of others, such as clinic staff and escorts, seeking to preserve women's rights. One woman who volunteers as a clinic escort stated that "[o]n four occasions I have been physically threatened. . . . [One man] walked back and forth in front of the Atlanta Surgi Center with a big sign on a heavy wooden handle. He shoved me repeatedly and said, 'Stay away from me or you could fall and really get hurt' and 'You could have a bad accident.' C37.

In another incident in which physical violence was threatened,

> A man in his late 50's or early 60's, about 6'1" or 6'2" . . . approached me and stood very, very close to me. . . . He continued to breathe heavily, as though he were barely restraining himself from hitting me . . . . He said, 'You had better get out of here, miss.' I was scared, but I knew he was trying to scare me into leaving, so I kept standing there, looking into the crowd. He said again, 'I'm warning you, miss. Leave now.' I did not. He then took one of the wooden stakes, which seemed, from my peripheral vision, to be about a foot long made from rough lumber with a point at the end and a metal sheet in the middle, out of his bundle and into his free hand. It was trembling. He brought it up to my left eye, a little to the left of the center of my eye, and about

> 2 or 3 inches away from my face. He began to twist the stake slowly from side to side, not saying anything, but breathing heavily. Then he said, 'Get out of here!' and he jabbed the stake toward my eye on each syllable. . . . It was the first time in my life that I had been physically threatened. He was taking advantage of the fact that he was a foot taller than I, at least 100 lbs. heavier, and, for all practical purposes, armed. . . . I put myself at tremendous risk of assault. . . . C16.

At an Operation Rescue action in New York, a blockader

> ran to the side of the drive and picked up a jagged rock. He came back and stood at my side of the car and tapped the rock against the windshield. He kept threatening us, saying no one else was around. I was too scared to look around to see if he were telling the truth, but I grabbed my camera and got pictures of him holding the rock. I rolled down the window so I could hear what was going on outside and I heard him say he was going to kill us if we did not move. I was terrified because not only was the rock about 8 inches from my face on the windshield, but one of the WACDTF [Washington Area Clinic Defense Task Force] members had recently been hospitalized after an OR [Operation Rescue] member attacked her with a flashlight in an abandoned parking lot. I grabbed a jacket to shield myself from the glass if it shattered . . . . C16.

In another incident, a blockader threatened to run over a pregnant woman who was working as a clinic escort.

> I was standing in front of [his] van. . . . As the van approached me, in a panic, I pushed back against it. A nearby police officer ordered [him] to stop. Continuing forward, [he] screamed, 'No we have to go rescue babies.' . . . The police officer then slammed his hand on the top of the van and again ordered [him] to stop. This time [he] did stop. I was pregnant at the time this took place. This caused me to have some early pregnancy spotting. C13.

The tactics used by petitioners and similar organizations are extreme. In order to deprive women of their legal rights, clinic blockaders frequently move beyond their verbal threats and resort to physical violence. One clinic director described an experience in which,

> The mob pushed me all the way to the front door . . . and proceeded to pin me and the guards against the brick wall and door. . . . These people were physically rough and abusive . . . . They hit us, they bit us, they pushed and shoved us. I was elbowed so many times I thought I would faint. . . . For three and a half hours I was against that brick wall and door while the Operation Rescue people held bibles up to hide their friends' faces on the bottom of the pile that were pinching, hitting, and biting us. C33.

Women seeking to exercise their legal rights and their supporters have sustained serious injuries at the hands of the blockaders. A clinic escort, who identified the attacker, 'Ed', as one of petitioner Randall Terry's bodyguards, wrote that,

> 'Ed,' . . . rush[ed] my partner, picking her up, and slamming her against the brick wall of the hotel. She got up off the ground, whereupon, 'Ed' rushed her again, forcing her to the ground, kicking her in the stomach, back, face and breasts. 'Ed' then pulled out his metal flashlight and began clubbing my partner on the head and neck with the instrument. During this time, my partner had curled up in a ball, attempting to protect her head and body. . . . 'Ed' was screaming at my partner that he was 'going to kill her,' calling her a 'murderous bitch', 'cunt', 'whore' and 'slut'. C43.

In another violent incident,

> [S]ix men rushed around the corner, knocking me into a wall, a desk, and I finally landed on the floor. The invaders made their way to the patient waiting room where they used kryptonite locks to chain themselves together. . . . [I have made] nu-

merous trips to doctors and under[gone] physical therapy for three months for injuries sustained in their assault. . . . C22.

Another clinic escort described how,

> They [clinic blockaders] began pressing against us and somehow one of the clinic defenders fell or was pushed into one of the panes of plate glass and it shattered. . . . I felt numerous times that the physical pressure would do some damage to my body. I was also very afraid, as I think we all were, that if the OR [Operation Rescue] people kept pushing us against the doors, another pane of glass might give. And the most disturbing and frightening thing about it was that when confronted with the prospect that we might get hurt, most of the OR [Operation Rescue] people didn't seem to care. C34

In the course of employing these intimidating and violent tactics, the clinic blockaders display an utter disregard for the dangerous effects their actions have on women's health. The blockades cause more than a deprivation of legal rights, they endanger the health of women seeking critical medical care.

> Two women were there for the second day of a two-day surgical abortion procedure, in which a delay of the second days' surgery (following an injection given the day before) can threaten the patient's reproductive system and her life. . . . [No other clinic in the area performs such procedures.] This was not something that concerned the 'pro-life' people in the least, however. They descended on the van [in which the two women were waiting] like locusts and screamed every epithet in the book, calling the women murderers, raving about blood and bones and death, and waving grotesque photographs. The women were in tears. . . . The women were trapped in the van. . . . [They] were not able to return to the clinic until 7 p.m. that evening. Fortunately no serious complications resulted, but not only were they intimidated, threatened, and verbally

> abused by "Operation Rescue," their lives and health were put in danger. C1.
>
> The [clinic blockaders] demonstrated their disregard of women's health and well-being. This becomes evident when they shout to a woman . . . 'You should die, not your baby.' These are individuals who disrespect the integrity of a woman's conscience and care little about her life or her family's life. C5.

In some cases, according to a clinic escort, "women had to wait lengthy periods after entering clinics, in order for their blood pressure to return to normal levels, so that medical procedures would not be unduly risky." C44.

The behavior of clinic blockaders is so frightening and intimidating that women are forced to take actions that endanger their health and lives in order to escape from the blockaders.

> Another anti-choice protestor who is a large man, runs up the street at women. These women are so startled by a strange man running at them, that several of them have darted into the street to try and avoid him. They run into the street without looking for oncoming traffic. This has led to close calls and the anti-choice activist has endangered the welfare of citizens by his aggressive actions. C39.

Petitioners have been so effective in their tactics of intimidation that in many areas, the local police have been either unable or unwilling to stop blockaders from depriving women of their rights. For example, in a town in Georgia,

> The protesters have successfully intimidated the Mayor of this small city located within the metropolitan Atlanta area and the Police Chief as well. It is seldom that we have any significant action by the Mayor, the Police or the County law enforcement officials in regards to their criminal activities. C66.

Frequently, the police are not only unhelpful, but also display a callous and offensive disregard for the rights of the women seeking their assistance.

> One of the policemen told me that they didn't want to take sides. When I said that I assumed that he would be on the side of the law, he just shrugged his shoulders. . . . One lieutenant said they should be out chasing 'real criminals like rapists who are supposedly a cause of all these abortions.' C62.

Among the letters that describe the refusal of local police to provide assistance were the following:

> I approached one of the policemen that were at the building and told him that these people were interfering with my right to see my doctor. He told me he couldn't do anything because it could cause a riot. C48.

> On May 3, 1987, approximately 80 anti-abortionists in teams of 20 per group physically blocked the driveways and streets to the surgical clinic. The police were aware that this activity would take place but made no effort to stop the criminal trespassing. C66.

In some cases the police simply stand by while clinic blockaders engage in violent activities.

> In the spring of 1990 Women's Health Services had over two hundred protesters in front of the high rise office building where they are located. The escorts had formed a protective wedge around the patient and her friend. As we approached the entrance of the building the crowd of anti-abortion protesters swelled. They screamed at the patient calling her a murderer and they told her the abortion would give her brain damage, we pushed on. An escort to the left of the patient had his knee kicked out from underneath him, he fell to the ground. . . . Suddenly an older women pushed a small child in front of my legs. I had over 30 people pushing from behind and somehow I managed to not step on this child who surely would be crushed by the throng of people. I

> placed my hand on the child's shoulder and pushed her to the side as quickly and gently as I could. The police stood by and watched as we approached with a look of astonishment but they did nothing. C54.

The activity in which petitioners engage is precisely the kind of politically motivated mob violence designed to prevent persons from exercising their rights to which section 1985(3) was intended to apply. Because petitioners' conspiracy involves the use of physical force, intimidation and violence to prevent a protected class from exercising their protected rights, this case does not require, as petitioners suggest, this Court to interpret 42 U.S.C. § 1985(3) to be a federal remedy "for all tortious conspiratorial interferences with the rights of others." *Griffin v. Breckenridge*, 403 U.S. at 101. Indeed, the activity enjoined in this case, like the activity in *Griffin*, is "so close to the core of the coverage intended by Congress that it is hard to conceive of wholly private conduct that would come within the statute if this does not." 403 U.S. at 103. The "terrorist" behavior of petitioners is remarkably similar to the conspiracy of violence and intimidation carried out by the Ku Klux Klan against which Congress intended this statute to protect.

> About 15 members of the crowd began to chase after us, yelling, 'Stop!' . . . It hit us that we were being chased by an angry mob. Both of us are civil rights history buffs and at that moment we understood what it felt like to be a black voter in Mississippi in the 1950's. There was just no telling where the mob would draw the line. They had attempted to blockade us in the house, lain in wait for us to try to get out, screamed epithets at us, shoved us backward into the crowd, away from the street, and run after us with signs and pictures. C16.

CONCLUSION

For the foregoing reasons, the judgment of the Court of Appeals should be affirmed.

Respectfully submitted,

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APPENDICES

APPENDIX A

STATEMENTS OF INTEREST OF *AMICI CURIAE*

THE NATIONAL ABORTION RIGHTS ACTION LEAGUE FOUNDATION (THE NARAL FOUNDATION), and its affiliated organizations, the National Abortion Rights Action League and 41 state organizations, have approximately 500,000 members nationwide. The NARAL Foundation is dedicated to public education and legal efforts to protect women's reproductive rights, including protecting women's access to abortion and related services. The NARAL Foundation recognizes that guaranteeing women the full range of reproductive choices is critical to women's health, autonomy and equality.

ABORTION RIGHTS COUNCIL OF MINNESOTA does not seek to prohibit persons from peaceably assembling and protesting. However, we strongly object to any attempt to threaten the safety or hamper the safe passage of clinic patients as they attempt to procure legal medical treatment. In Saint Paul, Minnesota, last June, an illegal blockade cost city taxpayers over $5,000 in wages, equipment, and compensation to a police officer who was injured by protesters. We hope that the Court will condemn such violent, terroristic acts.

AMERICAN ASSOCIATION OF UNIVERSITY WOMEN (AAUW), a network of 135,000 college-educated women, promotes equity for women and girls, education and self-development over the life-span and positive societal change. The AAUW supports the right of every woman and girl to safe and comprehensive reproductive health care and believes access to legal abortion should be guaranteed to all women and girls. AAUW believes that decisions concerning reproductive health care are personal ones, and that the right to make informed decisions should be available to all women.

AMERICAN MEDICAL WOMEN'S ASSOCIATION, INC. (AMWA) is a nonprofit organization of 12,000

women physicians and medical students. One of AMWA's primary missions is to promote quality health care for women. AMWA strongly supports laws which protect the health of women, particularly the right of the pregnant patient, in consultation with her physician, to make a personal and medically informed decision whether or not to continue a pregnancy.

B'NAI B'RITH WOMEN is an organization of 100,000 Jewish women dedicated to uniting Jewish women. Since 1968, the organization has held that women should have the right to choose for themselves on matters of reproduction. The organization has reaffirmed that right many times by reiterating its opposition to any legislation that restricts a woman's freedom to choose whether, when or if to bear children.

CALIFORNIA WOMEN LAWYERS is an organization founded in 1973 for the primary purpose of improving the situation of women in the State of California. CWL is the largest women lawyers organization in the world, with several thousand individual members, and speaking for 30 women's bar organizations in California. From its inception, CWL's agenda has included increasing the numbers of women appointed to the bench, admitted to law schools, offered jobs and partnerships in law firms, and eliminating gender bias in the courts. It has also been committed to all issues affecting a woman's right to choice, lobbying against various parental consent bills and working with a broad-based coalition to encourage funding and support for programs supportive of choice.

CATHOLICS FOR A FREE CHOICE is an independent national organization established in 1973. One of CFFC's objectives is to protect the legal right of all women and girls to act as moral agents in decisions related to sexuality and reproductive health care without coercive legal or quasi-legal interference by religious institutions. As Catholics, CFFC members support policies of strict separation of church and state based not only on the U.S.

Constitution but also on the Roman Catholic Declaration on Religious Liberty (Vatican II Dignitatis Humanae, 7 December 1965) which declares ". . . the civil authority must see to it that the equality of the citizens before the law, which is itself society, is never violated, either openly or covertly, for religious reasons and that there is no discrimination among its citizens."

CENTER FOR WOMEN POLICY STUDIES brings policy recommendations on the "second generation" of complex reproductive rights/health issues to state legislators, state and local judges, and advocates for choice and women's rights; focuses on legal and ethical issues surrounding the new reproductive technologies and on the effort to define a legal status for the fetus, in the context of women's equality and reproductive autonomy; produces Resource Collections and Policy Briefs, including the first Resource Collection, *The Law and Pregnancy: Protection or Punishment;* works with key organizations, including the Women's Legislative Network of the National Conference of State Legislatures, to reach policymakers; continues the Reproductive Laws for the 1990s Project, which began in 1985 under the aegis of the Women's Rights Litigation Clinic and the Institute for Research on Women at Rutgers University.

COALITION OF LABOR UNION WOMEN (CLUW) is America's only national organization for union women, with 75 chapters across the country and members from more than 60 unions. CLUW pursues the goals of the labor movement, fighting for decent wages and working conditions and a stronger voice for working people in society. CLUW strives to make organized labor and the public in general more sensitive to the needs of working women. By convention resolution, CLUW supports the right of every woman to make reproductive choices free from government interference and supports access to a full range of health care and family planning serices, without restrictions.

EQUAL RIGHTS ADVOCATES, INC. (ERA) is a San Franciso-based public interest legal and educational corporation dedicated to working through the legal system to end discrimination against women. It has a long history of interest, activism and advocacy in all areas of the law that affect equality between the sexes. ERA believes that the right to control one's reproductive life is fundamental to women's ability to gain equality in other aspects of society.

FEMINIST MAJORITY FOUNDATION is a national educational and research organization which works for women's equality and reproductive freedom and against sex discrimination. The Feminist Majority Foundation runs the Clinic Defense Project in Los Angeles, California to protect the right of women to seek unimpeded health care at clinics.

LAMBDA LEGAL DEFENSE AND EDUCATION FUND, INC., founded in 1973, is the nation's oldest and largest national legal advocacy organization working in furtherance of the rights of lesbians and gay men. As an organization representing the lesbian and gay community's belief in the constitutional right to liberty and bodily autonomy, Lambda strongly supports the position that women in our society are constitutionally entitled to make their own decisions about whether to choose abortion.

The purpose of the **MEXICAN AMERICAN WOMEN'S NATIONAL ASSOCIATION** is to promote and enhance the social, economic, political and educational advancement of Hispanic women.

NATIONAL ASSOCIATION OF COMMISSIONS FOR WOMEN is an organization which seeks to eliminate all forms of discrimination. We believe that all persons have the right to make their own choices about medical care and procedures and should have access to such care without being subject to harmful intimidation and harassment.

THE NATIONAL BLACK WOMEN'S HEALTH PROJECT (NBWHP) is a self-help, health education and advocacy organization which works to improve the health status and quality of life for African American women and their families. It consists of 150 developing and established chapters in 25 states serving a broad constituency of approximately 2,000 members. The NBWHP is deeply concerned about barriers that impede or prevent access to quality health services, including abortion. The already poor health status of low income African American women, due in part to lack of access to health care, is further exacerbated by the hostility, intimidation, and harm caused by clinic blockades. The NBWHP joins this brief to voice its opposition to the violent and harmful actions and tactics of Operation Rescue which prevents African American women from exercising their right.

NATIONAL COUNCIL OF JEWISH WOMEN (NCJW), founded in 1893, is the oldest Jewish women's volunteer organization in America. NCJW's 100,000 members in more than 200 Sections across the United States keep the organization's promise to dedicate themselves, in the spirit of Judaism, to advancing human welfare and the democratic way of life through a combination of social action, education and community service. Based on NCJW's concern for individual rights and our National Resolutions which include working for "the protection of every female's right to choose abortion, and the elimination of obstacles that limit reproductive freedom," we join this brief.

The **NATIONAL FEDERATION OF BUSINESS AND PROFESSIONAL WOMEN'S CLUBS, INC. (BPW/USA)** is a membership organization of working women with a mission to promote "full participation, equity and economic self-sufficiency for working women."

NATIONAL INSTITUTE FOR WOMEN OF COLOR advocates the right of women of color to exercise freedom of choice in decisions relating to our reproductive health needs. This includes the decision to seek an abortion.

Public clinics serve a large portion of low-income women and women of color are disproportionately represented in this group. Therefore, it is imperative that access to services provided by the clinics not be denied to women of color, curtailing our rights of choice and access to health care.

NATIONAL WOMEN'S CONFERENCE COMMITTEE serves as the only body currently constituted under Public Law 94-167 to monitor and implement the 1977 National Plan of Action for Women. We work with the Council of Presidents nationally and with 30 statewide networks to address issues in that plan, approved by a democratically representative group from every state and territory; item #21, "Reproductive Freedom" states, "We support the US Supreme Court decisions which guarantee reproductive freedom to women. We urge all branches of Federal, State, and local governments to give the highest priority to complying with these Supreme Court decisions and to make available all methods of family planning to women. . ."

NATIONAL WOMEN'S HEALTH NETWORK is a nonprofit advocacy group concerned with the status of women's health. Our membership is composed of 11,000 individuals, many of whom could be directly, and adversely, affected by the lack of free access to reproductive health facilities.

NATIONAL WOMEN'S PARTY includes freedom of reproductive choice as an issue on its agenda.

NATIONAL WOMEN'S POLITICAL CAUCUS (NWPC) is a nonprofit organization supporting the appointment and election of women to public office. NWPC also supports legislative initiatives at the state and national levels to insure fairness and equity for all Americans.

NORTHWEST WOMEN'S LAW CENTER is a nonprofit, membership organization in Seattle, Washington, that works to advance legal rights for women through

litigation, legislation, education and providing free legal information and referrals. The Law Center has done extensive work in the area of reproductive rights, including litigation against Operation Rescue in which the Law Center obtained a permanent injunction against blockaders in Washington State. That case is now on appeal to the Ninth Circuit Court of Appeals.

VOTERS FOR CHOICE is an independent and bi-partisan political action committee. In order to preserve safe, legal and accessible abortion services for all women, regardless of geographic location, age or economic status, Voters For Choice works to elect pro-choice candidates to federal and state public offices.

The **WOMEN'S INTERNATIONAL LEAGUE FOR PEACE AND FREEDOM (WILPF)** has been working since 1915 to unite women to oppose war, exploitation and oppression. WILPF stands for equality of all people in a world free of racism and sexism; building a constructive world through peace and disarmament; and changing government priorities to meet human needs.

WIDER OPPORTUNITIES FOR WOMEN has worked nationally and in Washington, DC, for twenty-seven years to achieve economic independence and equality of opportunity for women and girls. WOW has a solid track record of achieving advances for women in economic policies, employment practices and employment training programs. As an organization committed to improving the economic status of women, WOW is deeply concerned that women's reproductive rights be protected, as well as their health and well-being.

WOMEN'S MEDICAL FUND, INC. has assisted thousands of indigent and needy women to obtain abortion care through its volunteer charity, a tax-exempt fund. Some of the women we have helped, like U.S. women everywhere, have experienced violence, harassment, taunts, indignities and needless trauma in their effort to exercise their legal and moral right to choose abortion.

The **YALE JOURNAL OF LAW AND FEMINISM** is committed to publishing pieces about women's experiences, especially as they have been structured, affected, controlled, discussed, and ignored by the law. These experiences include the particular experiences of women of color and lesbians; they include rape, battery, sexual abuse and harassment, reproductive slavery, isolation, powerlessness, and oppression; and they include experiences of sexual and reproductive agency, community, power, and freedom. Too often, people have neither believed accounts of nor printed pieces about these experiences. The Journal prints them because it seeks to provide a forum for voices too seldom—perhaps never—heard.

ZERO POPULATION GROWTH is a national, nonprofit organization with 35,000 members. Founded in 1968, it is working to achieve a sustainable balance between the earth's population, environment and resources. The organization supports voluntary efforts to stabilize population growth through education and advocacy programs.

APPENDIX B

LETTERS FROM WOMEN AND THEIR SUPPORTERS WHO HAVE EXPERIENCED THE USE OF FORCE, VIOLENCE, AND INTIMIDATION IN ATTEMPTS TO PREVENT WOMEN FROM EXERCISING THEIR RIGHT TO TRAVEL AND OBTAINING THE SERVICES OF MEDICAL FACILITIES THAT PERFORM ABORTIONS.

The texts set forth herein are the complete transcriptions of the letters quoted in part in the brief of *Amici Curiae*.[1] Additional letters are lodged with the court.

LETTER—C1

My name is [ ]. As a member of the Washington Area Clinic defense Task Force, I have been a clinic escort at area abortion clinics experiencing harassment by Operation "Rescue" for nearly two years. During this time, I have witnessed numerous incidences of extremely intimidating behavior, and in some cases violence, by "rescuers" at various clinics.

One particularly awful experience was an attack by OR and affiliated groups on Hillview Clinic in Suitland, Maryland, on November 18, 1989. One antiabortion protester smashed through a plate-glass window in the front of the building in an early attempt to get inside the clinic to blockade and/or vandalize it. Nearly 800 members of Operation "Rescue" descended on the clinic, and pro-choice volunteers were unable for quite some time to get patients into the clinic.

Two patients were waiting in a "safe van" provided by pro-choice people. These two women were there for the second day of a two-day surgical abortion procedure, in which a delay of the second day's surgery (following an injection given the day before) can threaten the pa-

[1] The texts of these letters are reproduced as originally written, maintaining any errors in punctuation, spelling, or grammar.

tient's reproductive system and her life. Hillview clinic is the only clinic facility in the Washington area which performs such procedures, and these women could not affiord the cost of a hospital procedure.

This was not something which concerned the "pro-life" people in the least, however. They descended on the van like locusts and screamed every epithet in the book, calling the women murderers, raving about blood and bones and death, and waving grotesque photographs. The women were in tears. A circle of pro-choice people formed around the van to keep the antis away from the women, and we were forced to stand there, arms linked, for over three hours. The women were trapped in the van.

When it became apparent that things would not clear out for some time, the women in the van were taken elsewhere to wait and decide what they wanted to do. As the van attempted to pull out of the parking lot, OR members once again swarmed in from of it and on top of it, jumping in front of the van, and holding signs in front of the driver's windshield, making driving extremely dangerous.

The women in the van were not able to return to the clinic until 7 p.m. that evening. Fortunately, no serious complications resulted, but not only were they intimidated, threatened, and verbally abused by Operation "Rescue," their lives and health were put in danger.

I was also an escort during an Operation "Rescue" attack on Richmond Medical Center for Women in Richmond, Virginia, in April of 1990. At one point, an OR "sidewalk counselor" began to chase a patient through the residential streets as she attempted to make her way to the clinic. The patient was literally running at top speed and pleading with the OR member to leave her alone, but the "counselor" continued the chase. Two other clinic escorts reached the woman, who grabbed onto their arms and ran with them to the clinic.

There was yet another assault on D.C. area clinics on November 1991. Capital Women's Center, at 22nd & O Streets N.W. in Washington, was blockaded by OR on the final day of the hits. Several neighborhood residents volunteered their house so that patients could wait in privacy and safety while the police arrested OR members and cleared the area.

Unfortunately, OR people figured out where the safe house was and began to surround it, trying to climb up on the porch, peer inside, trying to open the windows (the door was locked) and so forth. Pro-choice volunteers were once again forced to form a human wall in front of the house to protect the patients. When the patients were escorted out by pro-choice volunteers and police, the antis tried to chase after them, grabbed at them, and screamed at them.

I have heard all sorts of horrible things shouted by Operation "Rescue" members at women who are going into clinics. One man yelled at a black woman, "You bitch . . . they're going to kill your little black baby." They call women murderers, tell them they're possessed by Satan and are going to hell. If a woman has a child with her, they will say, "What a beautiful baby. Do you want to kill this one too?"

Patients, clinic staff, and clinic directors have been followed home by Operation "Rescue" and harassed in their neighborhoods and by phone. O.R. claims to want to help women, but anyone who has seen them in action knows that is a lie. They are abusive, intimidating, and cruel to women.

• • •

LETTER—C2

My encounters with anti-choice protestors began the weekend after the April 9, 1989 pro-choice march in Washington, D.C. I and other members of N.O.W. became "escorts" at an abortion clinic, Women's Com-

munity Health Center, at the request of the staff. The way the clinic was situated, the protestors could stand right in front of their door and annoy the patients. We, more or less, acted as a buffer between the patients and the protestors. We continued this service for a little over a year until the clinic moved to a location where, although the protestors are still there, it was not practical for us to be there. Believe it or not, the doctor next door (an OB/GYN physician by the name of [ ]) allows the anti-choice protestors to stand in his parking lot which adjoins the abortion clinic, and harass the patients of Dr. [ ], the abortion provider.

Fortunately we have not had "operation rescue" type of problems here—yet. What I have witnessed, besides the usual "preaching" about Jesus and pleading with the patients to not murder their babies, spreading lies and showing little plastic models of babies and bringing little babies of all colors to the clinic for the patients to view as they go in the door, is the protestors photographing each patient as she goes in the abortion clinic. I actually saw one protestor continue to photograph two women even after the women had hold him to NOT take their picture. As a matter of fact the protestor, after being told to not take the ladies picture, smirked as he continued to take snapshots.

Of course, the protestors took our pictures and would even try to sneak a recorder in their pocket and get close to us to record what we were saying. Whenever we have an event, the anti-choice people manage to take our pictures and record what we say—all of which is okey with us.

It might also interest you to know that there was an office next door to the clinic (provided free by the owner of the building or very cheap) occupied by a so-called crisis pregnancy center. Patients of the clinic were often enticed in to this office for free pregnancy tests and anti-abortion movies and literature. Many times the patients

did not immediately that they were not in the abortion clinic.

I must ask: if our opposition's cause is so righteous, why do they have to lies and harassment?

• • • •

LETTER—C3

I have had numerous experiences with anti-abortion activities as an activist, a patient and as the Executive Director of an abortion facility. On one occasion I even went into a "fake clinic" to affirm all I had heard about their terroristic treatment of women seeking abortion.

In [ ], in recent years, the anti-abortion folks have limited their activities to photographing women entering clinics, recording license plate numbers, hate mail, the display of late term fetuses in clinic driveways and, of course, deceiving women into coming to their offices which advertise under the auspices of being actual medical facilities. Several years ago, Dr. [ ], my current employer, was set up by the antis to be hit by his car. In that same time period a priest chained himself to our clinic door and others invaded the clinic attempting to destroy the property and abortion equipment. Arrests were made for the invasion and prosecution was successful. With regard to the allegation of the anti-abortion activists that Dr. [ ] "hit" them with his car, the judge considered it ironic that a cohort happened to have a video camera to record the scene. The antis tried to drop the charges. Dr. [ ] countersued and won. No picketing has taken place at this facility since. Worth noting in humor—the last attempt they made to picket, it was determined they had to exercise their free speech outside of our private drive on a grassy area. Dr. [ ] promptly had a sprinkler system installed. After a couple of showers, they left this clinic alone.

Though the previous paragraph mentions the "limited" nature of current activities, [ ] Family Planning

Services, the clinic I direct, has received several forms of vandalism, including a gun shot through a window that caused the entire window to shatter. There has also been one bomb threat on January 20.

In May of 1989 I went with a freelance journalist into a Crisis Pregnancy Clinic located immediately next door to a [ ] abortion facility. As I was entering a pro-choice escort said to me, "Ma'am, you are not entering a legitimate abortion clinic." A woman who had been holding open the door to the "clinic" since I had opened my car door said, "Yes we are. Come right on in." She asked my name and acted as if she was checking it off of an appointment book. She took the urine I brought; it belonged to a pregnant friend. She then had me fill out the equivalent of what one would normally expect in a medical office. After completing the form, she said I, with my friend, had to view a film before I would be allowed to proceed any further. The film began as if it was a simple educational film to make certain I, the alleged patient, was aware of the risks with abortion, etc. Suddenly, before my very eyes, I witness an abortion in which the patient on the procedure table is jerking, as if she was receiving electric shock therapy or having an epileptic seizure. Blood was spattering everywhere as the physician was repetitively inserting a long tube into the patient's vagina; quickly and each time his arm would extend about two feet into the air before entering her vagina again. Then I viewed Dr. Wilke of National Right to Life fame speak of the "killing" I had just witnessed.

NARAL may be more interest in blockades, etc. The aforementioned is what happens on a day to day basis in [ ]. Terrorized women, fraudulently advertised to, entering "fake clinics" and before they realize where they really are, they have given their name, address and phone number.

As an escort I have observed anti-abortion picketers photographing all people who enter clinics. I know of one particular instance in which an anti recorded the license plate number, got the name of the owner and called to preach on the evils of abortion. Sadly, the person who owned the car was the mother of a woman who had not confided her pregnancy to her family.

Everything worked out fine but temporarily destroyed the relationship between mother and daughter. The daughter had been impregnated by the mother's boyfriend. While the patient did not consider her pregnancy a result of rape, she maintained that the mother's boyfriend had taken advantage of her when she arrived home in a drunken state. The incident was the only sexual contact of any sort for the patient in months.

The antis routinely place photos of fetuses on the windshields of cars parked at abortion facilities. They also force literature upon women as they get out of their cars to enter the clinics. The antis literally yell at women such things as, "Lady, don't kill your baby." and "We will pray for you not to go to the Devil." On several occasions anti-abortion activists have parked numerous cars in clinic parking lots, forcing women to park further away, thus enabling the antis a better opportunity to propagandize. They apparently schedule their "parking duties" in increments of 15-30 minutes because clinics have been unable to prove this. In many instances, one anti will park and another will drive her/him away.

I know my comments are of little help to your argument. However, I want you to know, there is so much I suspect but am unable to prove. I have driven into the parking lot of my job to find that our dumpster has been raided, etc. While Arkansas has been rather fortunate in terms of clinic blockades, we do have a fair amount of horrendous anti-abortion activity going on. I always refer back to the fake clinics because with each new edition of a phone book I learn of the proliferation of their

fraud (in the name of Christianity) by ads being placed under the "Abortion" heading. Communities with limited access to healthcare in general and college and metropolitan areas appear to be the primary target of the crisis or problem pregnancy businesses. I know of a recent instance involving a 34 year old woman who had already lost custody of two children fathered by two different men. She was a cocaine addict wanting an abortion. On three separate occasions, a crisis pregnancy center told her was not pregnant. They kept suggesting she had a "tumor" in her uterus. By the time she made it the clinic I direct, she was 23 weeks. She now has a sickly two month old girl, no job, no knowledge of who the father is and, unfortunately, a grim future.

Please feel free to contact me if I can be of assistance. Keep up the hard work!!

* * * *

LETTER—C4

I have worked at a doctor's office specializing in abortion for nearly ten years. I have dealt with anti-abortion activity and Operation Rescue in particular in almost every capacity; as a staff person, as an escort, as friend of patient, as a participant in many court cases—pretty much, you name it, I've been involved. Add to that the fact that our office is in the city where OR originated (we were the first place Randall Terry ever picketed) and it should be obvious that I have seen every type of intimidation and belligerence these people use in their attemts to control women's lives.

So—some "pithy" examples:

Twice (6/2/86 and again later that year) our private parking lot was filled with cars belonging to OR members, parked tightly togethet and locked to prevent us from opening our dooor and getting patients in. I took several hours for them to be towed; we did enjoy stomping around on the hoods a lot.

We had one real "Rescue" on 10/28/88. One hundred and fifty people sat in front of our door, some locked and chained together, in an attempt to keep the door shut, keep patients out, and harass and intimidate them. They resisted arrest and had to be dragged onto buses by the police.

Several times Randall Terry has invaded our waiting room, either alone or with a few cohorts, to "preach" and pass out "literature", often because he recognized a patient and wanted to harass her personally.

OR members standing at the edge of our parking lot have been heard to yell to patients "She's not a real doctor", "The ambulances takes dead women away from here all the time", "You'll never be able to have children again", "Your baby will feel pain and scream", "They're going to stick a metal tube inside you with jagged edges and crush everything", "They're going to put your baby through a meat grinder" etc. ad nauseum

Staff have been harassed at home and in public—OR has picketed homes and restaurants where staff are eating.

Our locks have been glued shut several times. OR picketers have recognized patients and followed them into the office and then called and harassed them at home.

I can't count the number of times I've seen a patient come in crying, near hysteria, totally intimidated by the OR picketers. Or the times patients have called from nearby, too frightened by protestors to even enter the parking lot. Or the times patients attempting to pull into the lot have had the way blocked by picketers refusing to move, so left and then called to say they couldn't handle it.

This is only a small part of what I have seen and heard. Feel free to contact me for more info or specifics, or if I can be helpful in any way.

* * * *

LETTER—C5

I am the Personnel director of the [ ] Women's Health Center. After three years of constant picketing and blockading, the [ ] Women's Health Center was invaded on October 24th, 1989. The invasion into our building was a frightening escalation of tactics by the anti-abotrion activists. Praying on our compassion, two women pretending to be harrassed by the protesters on the sidewalk, sought refuge in our building. Once the locked door was open, 39 men and 13 women charged out of a moving van and stormed into the [ ]WHC, knocking me to the waiting room floor.

While I was trying to reach the telephone, a man bodily trapped me while I watched hordes of people invade the building. I feared for the safety of the staff. I envisioned the damage and destruction to our property. Fortunately, some of the staff on the 2nd floor were alerted to the assault by the thunder of footsteps on the porch. They immediately locked the fire doors at the top of the stairs, effectively confining these individuals to the stairwell. There the staff remained, safely sealed from the attackers.

A patient was trapped in the counseling room adjoining the occupied hallway. She had come to the Health Center that day for further screening of an abnormal pap smear to determine if she had cervical cancer. Staff was unable to reach her. She was alerted through the intercom that the building had been invaded and that the police were on their way. When three men entered the room she bravely told them to get out and leave her alone. Police soon arrived to escort her to safety.

It took 6 hours to remove the intruders who had bicycle locked their necks together. As [ ] police attempted to remove these people, they struggled. Two policemen were injured in the process. Others were called Nazis. That afternoon most patients were contacted and rescheduled for the next day. Those we couldn't reach ar-

rived and were abused by individuals outside who climbed on their cars yelling and screaming "we are here to help you". Over the long hours of the afternoon I personally endured vicious name calling and was subjected to their hateful behavior. A man calling himself Father Baby John Doe kicked me. I felt violated and assaulted in my own building. Like any cycle of battering, after being abused, assaulted and violated, their leader Michael McHugh, thinking this to be a righteous act turns and winks, stating, "we really love you people".

These fanatics reveal their true agenda. They demonstrated their disregard of women's health and well being. This becomes evident when they shout to a women in the driveway "*You* should die, not your baby." These are individuals who disrespect the integrity of a woman's conscience and care little about her life or her family's life.

Despite continued harassment, battering and the promised acceleration of these violent actions, the staff at WHC is resolved to continue to provide women with the quality care they deserve.

* * * *

LETTER—C7

I have volunteered to write a letter to you addressing the behavior of Operation Rescue supporters I observed while acting as a "defender" of a Planned Parenthood Clinic during the "DC Project II" in November 1990 as requested by the NARAL Foundation here in DC.

The most outstanding characteristic of the Operation Rescue participants that I felt was the feeling of a tremendous wall of water waiting for the dam to break. Clearly, no one knew any plan of action, but were simply waiting for someone to say the word to stampede. There was no central organization other than one person with a walkie-talkie. Early in the morning, there was a large crowd gathering across the street from the Planned Par-

enthood facility. They began shouting and chanting, many pacing back and forth. Some would choose a single person in the defender line to direct intimidating verbal attacks. Others simply damned the lot of us to Hell. Those that participated in verbal assaults encouraged others to do the same, often chiding their cohorts if they were reluctant to speak. Police came at some point and put up a police line, but to no avail. A signal was given and much of the crowd crossed the street. There was a period of time when Operation Rescue participants pressed up against the tape and the defenders, sometimes trying to crawl through people's legs. At no point after the crowd shifted across the street was there a break in the pressure of the Operation Rescue participants, until a signal was given and the crowd left the area.

The Planned Parenthood Clinic was the target of a minor hit that day, but I have never been in a more threatening situation. I was thankful that I wasn't involved in the more intense "scuffles" of the day.

* * * *

LETTER—C8

I am the project coordinator of the [ ], a project of the [ ]. We are a non-profit volunteer organization which defends women's health care clinics from Operation Rescue.

In my two years of organizing abortion-rights activists to counter Operation Rescue blockades, I have seen dozens of incidents of harassment, physical violence, and just plain cruelty directed at the women (and often times men) who need to get into these clinics; not just to receive abortion services I might add, but for the myriad of other services they provide—pap smears and cancer screening, prenatal care, VD testing, AIDS testings, pregnancy testing, etc.

There is however one experience I would like to relate to you which stands out in my mind; one which illustrates

not only the sheer meanness and unprovoked nature of Operation Rescue's tactics, but the pain and suffering they cause others.

In the summer of 1990, we received a call from the [ ] clinic located in East L.A.; a primarily low-income Hispanic neighborhood. These neighborhoods are favorite targets of Operation Rescue due to the fact that their residents have few health-care options available to them. Not only had this clinic been blockaded on several occasions in the past, but they were experiencing heavy picketing by Operation Rescue on the weekends as well. A priest by the name of Father [ ] was bringing out his church group—composed primarily of young teenagers—and instructing them to harass the women entering the clinic.

The clinic's doctor, Dr. [ ], shared office space with a dentist by the name of Dr. [ ]. On Saturady mornings, Dr. [ ] arranged for a dentist who specialized in children's dentistry to use his office so as to service the disadvantaged children of the area. The picketers were disrupting Dr. [ ]'s practice as well.

One Saturday, while the specialist was working at the office, a woman in the company of her two children approached the clinic. They were met by a frenzy of hostile picketers who shoved at them photographs of what they claimed were aborted fetuses and screamed at the mother, "Don't kill your baby!" The fact that the woman was there to see the children's dentist did not phase the picketers and they continued to harass and block her entrance into the clinic. Members of the center's staff had to step outside to help her in.

However once inside, the children were hysterical, crying out, "Mommy, don't kill us!"

As you might imagine, everyone involved—the mother, the children, the doctor and his staff—were terribly upset by the incident. The situation at the clinic continued on

this way for several months with little help from the local police. It finally ended when the priest and his church group decided to move on to another clinic. Currently, they are harassing women at a health care facility located in [ ], another low-income Hispanic area. The [ ] clinic, its patients and its staff, are experiencing the same kind of terror and frustration as were the folks in [ ].

The sad fact is, we can expect these types of situations to repeat themselves until *you* make it clear to member of Operation Rescue that behavior such as this will *not* be tolerated in a society which claims to care about its citizenry and their right to safe access to medical care.

Please, in reviewing the *Bray v. Alexandria Women's Health Clinic* case, keep in mind who Operation Rescue really is; their anti-woman agenda and the illegal tactics they employ. Most importantly, consider the people who are made to suffer the greatest; the poor and disadvantage of our community who have so few options to choose from, and who utilize women's health care facilities for the variety of services they provide.

* * * *

LETTER—C9

In November 1989 I was at the [ ] Clinic in [ ] Maryland when Operation Rescue blockaded the building.

Many incidents happened that were disturbing. The O.R. people followed a young woman across the street to her car and surrounded it. They then shouted at her shoving gory pictures of "fetuses" and plastic fetus-like dolls at the windows. At the clinic they encircled several of the clinic escorts, myself included, and pushed us away from the door back into the parking lot. People vied for the building doors and several clinic escorts were shoved into the plate glass windows and received cuts from the confrontation.

While the shoving and pushing was bad enough, the yelling and the taunts never stopped. They were an extremely persistent group and showed no respect even for very small children. A mother with her two children were simply walking by the clinic and cam up to find out what was going on when the O.R. people shouted at the woman and showed bloody pictures to her children who were horrified. The woman was very angry and upset and left the scene saying she would remain pro-choice. It was a disturbing incident—in fact, the whole day was very upsetting.

* * * *

LETTER—C12

Enclosed are my notes on the events that occurred on November 12, 1988.

At 9:10 a.m. my husband, girlfriend and I arrived at the Bellegrove Office Park. We entered the main doorway and saw a group of people in front of the entrance to my doctor's office. Whem we approached this people, we noticed that they all had signs around their necks. The group consisted of approximately 10-12 people with a man in front stretching his arms and legs from wall to wall.

When we reached the group, the front man said, "The doctor will not be seeing you today."

"Why," I asked.

Because he kills babies for money," he answered.

"He also delivers babies for money," by husband said.

I said, "I have to have a test at exactly 9:15 this morning, would you please let me in."

"If you need emergency care, go to the hospital," he answered.

"I am not here to have an abortion."

"We don't care."

My husband was going to force our way through, but at their very physical resistance, I asked him to stop. I slept very poorly the night before this occurred. I was having a lot of problems with hypoglycemia during my pregnancy with terrible headaches occuring when I didn't eat. I usually had to get up at least once during the night to eat to avoid these migraines. I had already endured a lot to be ready for this test and I did not want to go through it all again. After going through not eating, drinking high-sucrose liquid, the beginnings of a migraine and no sleep (not to mention being 7 months pregnant) this confrontation brought me to tears. As It was Saturady, my husband and girlfriend were there to comfort me. That was fortunate as I usually came alone to these exams.

Another patient came and led us around to the back entrance of the doctor's office. I was still very upset and was trying to calm myself down. I mentioned that I was here for the diabetes test and then went and waited in the lobby for a few minutes. There were three other women present in the lobby at that time.

My husband and I went into the exam room for my test. We had made a Saturday appointment specifically to discuss some important issues with my doctor, but due to the circumstances, it did not seem appropriate to bring these issues up at this time. He was visibly upset by this demonstration. This affected our doctor-patient relationship. After the test and my exam; my husband, girlfriend and I approached the back exit to leave. By this time there were lots of protesters outside. All three entrances were blocked by approximately 20 people each. I tried to open the door and they wouldn't move. They looked at us and started singing Christian hymns. I banged on the door and yelled at them, "You're not going to let us leave?!" To this, one person simply waved his hand at us and they went on singing and praying and

swaying. I just stood there amazed, I couldn't believe they were imprisoning us inside the building.

I was feeling fairly shaky and starting to be lightheaded by this point. The nurse offered me some tea, which I declined because I didn't want the caffeine, and I asked if they had any crackers. She got me some water and triscuits. I returned to the waiting room to wait and eat and try and deal with the anger I was feeling. I couldn't eat much because my stomach was so tied up in knots and the food was making me sick. My doctor was concerned about me and he offered to call an ambulance for me, thinking surely these people would let an ambulance through. I felt uncomfortable with that idea though as I was not having a medical emergency at that time.

We sat in the waiting room with a woman from NARAL and two other women. We discussed what we should do. The doctor called the police department again and asked them what they were doing about this situation. The [ ] P.D. had only 6 police officers on duty which they did not feel were enough to confront this situation and so they were calling in another shift. Meanwhile, we would just have to wait.

My husband then called 911 and asked for a police escort out of the building. Then another patient called 911 and did the same. Finally, after another 10 minutes of nothing happening, I called 911 and said that we were still waiting for our police escort. The dispatcher said that they were doing everything they could and we needed to just be patient and wait. Luckily our two-year-old daughter was with her grandparents and not with us as this would have been extremely traumatic for her. As it was, they were expecting us shortly and we couldn't reach them to tell them what was going on.

Time passed, with much pacing and speculation, and finally at approximately 10:30 to 10:45 (1 1/2 hours

after we arrived) the crowd in the front entrance separated and a man came down the stairs. We had locked the door to keep the protesters out, just in case. This man said that he was a police officer here to escort "the pregnant woman" out.

We asked to see his badge. He presented it and then I told him that would not leave unless everyone in the lobby who wanted to could leave with me. He asked the crowd if everyone could leave. They agreed and we filed out. The crowd called out things like, "God Bless You," and "We love you." At this point I was very mad and turned and said, "Bullshit!" Not knowing what else to do, we walked to our car.

This was very anticlimatic to us as we were all so mad at having our rights violated and being held hostage for such a long period of time. The news crews didn't ask for any statements from the people held in the office and that evening the news didn't even mention the fact that we were kept hostage by these people. It was very frustrating for us, because we felt that the public didn't know what these people were really capable of. My husband and I couldn't forget about it for quite awhile and were very tense and preoccupied. This caused our daughter, a high-need child, to feel very upset and we had quite a few bad moments. My husband and I fought a lot that evening, something that doesn't usually happen, due to this upsetting using situation. I also broke 4 crystal goblets that evening because I was too preoccupied to be thinking clearly.

These people have every right, in my opinion, to express their points of view. I deeply believe in our constitutional rights to freedom of speech. However, they do not have the right to infringe on my rights or put my unborn child at risk. Due to the circumstances I was very upset; and at 7 months pregnant, my doctor felt that an early labor could have been brought on by such

a situation. I have to say that I feel that these people are hypocrites. If anything, this demonstration by Operation Rescue has made me much more determined to see that women's rights are protected from people such as these.

Good luck in your efforts. If I can be of any future assistance, please feel free to contact me.

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LETTER—C13

As a volunteer escort, since April 1988, I could tell you numerous stories about Operation Rescue, it's affiliates and anti-choice "counselors" who go out to abortion clinics. I will relate three brief anecdotes in the hope that it will shed some light on the problems these people present.

First, in April 1988 I was exiting a 14 story building which housed on it's third floor an abortion clinic. Outside were approximately 10 anti-choice demonstrators. As I walked out the door, one of the protestors threw a rock which hit me solidly on the neck. This single event pointed out to me the necessity of assisting women in getting into clinics without harassment.

Another highlight event occurred around Thanks giving of 1988. A young woman (approximately 16 years old) and her mother asked me and another escort to escort them into an abortion clinic where there were about 20-30 "sidewalk counselors" and protestors present. As we approached the building, 7 or 8 anti-abortion "sidewalk counselors" rushed up to the young woman, screaming "don't kill your baby", and waving literature and physically separating the young woman from her mother. The young patent became so frightened, that she threw her arms around my neck and jumped up into my arms. I put may arms around the patient and, as I di so, the back or my hand brushed the coat of one of the sidewalk hasslers. The sidewalk hassler began

screaming that I had assaulted her. As I was literally carrying the terrified patient to the door of the building, the "counselor" was screaming at the police to arrest me. Fortunately, there were enough witnesses that the police did not arrest me.

Finally, on Dec. 2, 1989, "Project Rescue" was assembling in a shopping plaza to go, as a group, to a Maryland clinic. The people coordinating the "rescue" were C[ ] G[ ] and T[ ] O[ ]. I was standing in front of Mr. G[ ]'s van. He knew that I was a pro-choice escort. Mr. G[ ] decided that it was time to leave and began driving. As the van approached me, in a panic, I pushed back against it. A nearby police officer ordered Mr. G[ ] to stop. Continuing forward, Mr. G[ ] screamed "No we have to go rescue babies." Meanwhile, about 15 other pro-choice friends ran up and tried to lift the front of the van to prevent it from running me over. The police officer then slammed his hand on the top of the van and again ordered Mr. G[ ] to stop. This time Mr. G[ ] did stop. I was pregnant at the time this took place. This caused me to have some early pregnancy spotting.

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LETTER—C14

This letter regards the upcoming case of *Bray v. Alexandria Women's Health Clinic.* I feel compelled to write regarding my experience as a clinic escort who has witnessed the tactics of Operation Rescue and similar organizations.

From my experience in clinic defense, I am convinced that the agenda of Operation Rescue and similar organizations is not to exercise free speech, rather it is to bully and intimidate women from utilizing clinic services, services ranging from contraceptives, prenatal care, annual check-ups, pap smears, and breast exams to abortions.

Furthermore, there exists no doubt in my mind that they intentionally target women who are in a vulnerable position because they perceive women as easy marks and a convenient medium to advance their dictates of social behavior. The actions of Operation Rescue clearly demonstrate that the overall agenda of Operation Rescue is to scapegoat women for perceived social ills. From a spring board of moral arrogance, Operation Rescue feels empowered to accost women as they approach clinics and further subject these women to an invasion of privacy and public humiliation. Operation Rescue hopes to scare women away with such tactics. Furthermore, Operation Rescue does not care why a woman is going into a clinic. They use the clinic location as a venue to berate women and to attack any woman who does not fit their profile of how women should behave.

Physical intimidation and verbal assault are the primary tools employed against women by anti-abortion groups. They refrain from accosting men on public streets to demand personal information on pregnancy states, marital status, religion, or his sex life. Instead they assail women. A woman approaching a clinic is first surrounded by anti-choice demonstrators who shout at her to be heard over one another. If she tries to get away from them or says that she is not interested they persist in following, pressing themselves on her, and blocking her every step in order to continue their rebuke and deluge of contempt. Recently I witnessed a so called 'pro-lifer' hiss at a woman who was trying to extricate herself from a group of the blockaders, "Murderer, Murderer, Murderer. Kill, Kill, Kill."

The privacy and dignity of women is completely disregarded with every clinic blockade. That this kind of behavior has been condoned is unacceptable; that women specifically must bear the rage and contempt of Operation Rescue should no longer be endured.

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LETTER—C16

I write to describe my experiences as a patient escort for the Washington Area Clinic Defense Task Force. I have selected three of the most drastic circumstances in which I have found myself since I joined WACDTF last year.

The first violent experience I had with an Operation Rescue member was in the Fall of 1990 a the DC Project II "rescue". I had arrived at Planned Parenthood by Dupont circle at 5:00 a.m. to serve as a patient escort. I had been trained recently by WACDTF in escorting techniques and non-violent strategy. This training included instruction on how to de-escalate potentially violent situations, a necessity for me especially as I am 24 years old, 5'3", and 112 lbs.

Hundreds of Operation Rescue members and supporters gathered across the sidewalk from Planned Parenthood, and at about 7:00 a.m. began running toward the Washington Surgi-Center to blockade access. As my role on site is simply to escort patients into a safe clinic, I did not run over, but began to walk towards the clinic. When I reached the intersection of two streets a few blocks away from the clinic, I stopped because I expected some patients would walk by me on their way to the clinic and would need an escort. Both anti-abortion and pro-choice people were streaming by me. I was wearing an orange "pro-choice escort" identifying T-shirt.

A man in his late 50's or early 60's, about 6'1" or 6'2", wearing a clerical collar approached me and stood very, very close to me. He was carrying some sort of rolled up cloth which I assumed was a sign and wooden stakes to drive the sign into the ground. Because I was familiar with the basic tenet of never challenging a male who is physically threatening by looking him in the eye, I stood my ground, but looked into the crowd running past me. I kept my palms open so that he would see I was not looking for physical aggression.

He continued to breathe heavily, as though he were barely restraining himself from hitting me and to move very close to me, within 9" of my body. He said, "You had better get out of here, miss." I was scared, but I knew he was trying to scare me into leaving, so I kept standing there, looking into the crowd. He said again, "I'm warning you, miss. Leave now." I did not. He then took one of the wooden stakes, which seemed, from my peripheral vision, to be about a foot long made from rough lumber with a point at the end and a metal sheet in the middle, out of his bundle and into his free hand. It was trembling. He brought it up to my left eye, a little to the left of the center of my eye, and about 2 or 3 inches away from my face. He began to twist the stake slowly from side to side, not saying anything, but breathing heavily. Then he said, "Get out of here!" and he jabbed the stake toward my eye on each syllable.

I did not move, looking back on it, probably because I was too frightened to move. Then a group of escorts came by me and when he saw the orange T-shirts, he slipped back into the crowd and I did not follow him. I was pretty shaken up because this was my first hit. But it convinced me more that I needed to be out there escorting patients and protecting them from this type of violence.

The incident also angered me greatly. It was the first time in my life that I had been physically threatened. He was taking advantage of the fact that he was a foot taller than I, at least 100 lbs. heavier, and, for all practical purposes, armed. If I had been a patient, I would have fled immediately. I know that I did the right thing for myself and for the patients by standing my ground and refusing to show my fear. But I also realize that I put myself at tremendous risk of assault, and that if he had wanted to hurt me badly, he could have done it easily.

The second incident occurred a few hours later. About 10:00 a.m., Operation Rescue had blockaded the clinic,

so we could not get any patients in. We established a "safe house" to bring the patients into until the clinic was open again. We escorted two groups of patients in, when OR discovered the house. They stood outside waving pictures of aborted fetuses, etc., and shouting at the patients in the house. My partner and I slipped into the front door to find out what our next step should be.

When we looked out the window from inside the house, we saw that OR had surrounded the house in an attempt to trap the patients inside. We got a call from our group at the clinic who said that the police had secured the back alley and would hold it open for 5 minutes for the patients to get into the back door of the clinic. I quickly decided that, in order to protect the identity of the patients, patients should wear our orange T-shirts, and my escorting partner and I would pretend to be the patients. That way, the real patients would escort the escorts out of the house. We exchanged the shirts, and I took my hair our of the ponytail holder it was in so OR would not recognize me.

[ ], my partner, then attempted to open the door of the house. OR members were jammed against it in an attempt to keep the patients trapped inside. They were screaming "murderer", "please don't kill me, Mommy", "I will take your baby", and various other things. I heard one of them say "Don't let her out! Show her the dead baby!". I pretended to cry and grabbed [ ] hand. We struggled through the crowd, knowing that the two other escorts were leading the real patients into the back alley behind us. [ ] and I broke out of the crowd, and began to run up the street, away from the alley. About 15 members of the crowd began to chase after us, yelling "Stop!" and other things I mentioned before.

We finally turned the corner two blocks up the street and looked behind us. No one had bothered to follow us

that far. [ ] and I were both shaking and I realized I was crying for real. It hit us that we were being chased by an angry mob. Both of us are civil rights history buffs and at that moment we understood what it felt like to be a black voter in Mississippi in the 1950's. There was just no telling where the mob would draw the line. They had attempted to blockade us in the house, lain in wait for us to try to get out, screamed epithets at us, shoved us backwards into the crowd, away from the street, and run after us with signs and pictures. Having been a psychology major in college, I know a bit about crowd dynamics, and it surprises me to this day that [ ] and I escaped without being beaten up.

The third incident of violence occurred when [ ] and I were in Dobbs Ferry, New York to escort during a planned Operation Rescue hit. We had gotten up at about 5:00 a.m. to go to the meeting site of OR and see if we could get information about their plans. We were in our car in the parking lot of the OR hotel when we saw OR's leaders—B[ ] J[ ], K[ ] T[ ], and R[ ] T[ ]—get into a van and begin to drive away. [ ] was in the drivers seat and I was in the passengers seat of our car. We pulled out ahead of the van in the parking lot and, in an attempt to delay their departure, turned off the motor in our car, thus cutting off OR's path to the road.

After they leaned on the horn and we did not move, B[ ] J[ ], an ex-cocaine dealer who now works as T[ ]'s bodyguard, jumped out of the van and ran up to my window. He flashed some sort of press identification and said that he was with the press and needed to get out. I said our car was stalled and that our friends were calling the tow truck. Then he began yelling at [ ] to move the car or he'd make sure we moved. We did not move the car. Then he ran to the side of the drive and picked up a jagged rock. He came back and stood at my side of the car and tapped the rock against the windshield. He kept threatening us, saying

no one else was around. I was too scared to look around to see if he were telling the truth, but I grabbed my camera and got pictures of him holding the rock. I rolled down the window so I could hear what was going on outside and I heard him say he was going to kill us if we did not move. I was terrified because not only was the rock about 8 inches from my face on the windshield, but one of the WACDTF members had recently been hospitalized after an OR member attacked her with a flashlight in an abandoned parking lot. I grabbed a jacked to shield myself if from the glass if it shattered when [ ] pulled forward. We looked behind us and saw that the rest of the WACDTF caravan had arrived in the parking lot to provide witnesses and support. Our sense of relief was overwhelming and I managed to get pictures of the van's license plate.

The police had also arrived, so we followed the van onto the highway to see where it was headed. Another of WACDTF's cars had pulled out ahead of us and we saw the OR van attempt to run them off the road several times. We ended up losing sight of the van then.

The rest of the day was pretty antagonistic on both sides. I had to follow OR around all day, but they made no more threats. [ ] and I have decided never to drive with just the two of us in the car when we go on hits. We also decided to team up with another Task Force car when go to OR's sites. It is just too risky to travel in one pair. I cannot imagine the confusion and terror of a single patient who is not familiar with OR. They are an organized terrorist group that resorts to threats and violence to carry out their agenda. They are NOT non-violent pacifists or civil resistors.

I do hope these accounts help NARAL. I am giving you permission to use my full name and to contact me to speak or to testify on these incidents. Please do not hesitate to call on me if I can be of help.

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LETTER—C22

I am writing in response to NARAL's request for information regarding personal experiences with Operation Rescue activities.

I am the Director of Community Relations at [ ] Clinic in [ ], Virginia. Our clinic has been a target of anti-abortion activities since it's opening in 1973. In January of 1989 at the annual Roe vs. Wade day protest, D[ ] V[ ] announced the onset of local Operation Rescue activities in Norfolk. We had an aborted rescue approximately a month later. On April 29, 1989 a rescue was held rescuers blocked all entrances to our building. Sixty-two arrests were made and all were later convicted of trespassing. On May 25, 1989 before the clinic opened for the day I noticed a woman standing by the door to the clinic. I opened the door to let her know we would be open shortly, as I did, six men rushed around the corner, ripped open the door, rushed into the clinic, knocking me into a wall, a desk, and I finally landed on the floor. The invaders made their wya to the patient waiting room where they used kryptonite locks to chain themselves together. It took approximately two hours for the police to remove them from the clinic. Prior to this incident when asked by family and friends if I was afraid of the anti-abortionists I had denied that I would ever be harmed by any of the participants. However, after numerous trips to doctors and undergoing physical therapy for three months for injuries sustained in their assault, I now realize that they will stop at nothing to prevent women from exercising their legal rights.

The participants were found guilty of trespass and one male was found guilty of assault for which he received one weekend in jail. I was discouraged by the court's lack of appropriate punishment for this type of behavior. I filed a civil suit and the defendants were found guilty by a jury. I was awarded $7500 in damages. Several

unsuccessful attempts were made to recover the award from the defendants. I finally received one small check from a garnishment of one defendant's wages at CBN.

Since the invasion in May 1989 we have had numerous incidents of trespassing on private property and harassment of patients. We had another invasion on September 8, 1990; thirty-five arrests were made for trespass.

One January 26, 1991 approximately twenty-five members of Operation Rescue protested at my home carrying signs saying, among other things, that I support the murder of babies. Early this past March, Operation Rescue leader, Randall Terry, held a meeting at a local church. The day after the meeting a protest was held at our clinic at which Terry announced new tactics for OR including protesting at clinic employee homes. After the protest twenty to twenty-five participants moved their activities to my home and neighborhood. They carried sings and leafletted my neighborhood and nearby businesses. The handbills included by name and address, stating that I am a leading abortion provider at [ ], the local abortuary. (I am enclosing a copy of the handbill) The local police were called and a sergeant informed the protestors of a state statute prohibiting picketing in neighborhoods. To compound the confusion, two local television stations and the local paper showed up to cover the activity. The activities totally disrupted my home and my neighborhood for over an hour. Fortunately, most of my neighbors were supportive of my situation, even if they are not supportive of the abortion rights.

When I began working at [ ] as a counselor in 1985 I understood that not everyone would agree with my choice of employment. I also understood that by accepting the position of Director of Community Relations I would be more visible to anti-abortionists and therefore subject to more harassment. I did not. however, expect the behavior exhibited by members of Operation Rescue.

Members of this organization are terrorists, they will stop at nothing, not even physical assault to achieve their goals. I have heard their leaders compare their activities to Martin Luther King and the civil rights activities of the 1960's. I see no comparison, Reverend King espoused non-violent protests. Never was physical assault of individuals condoned.

Although the number of participants in OR activities seems to be shrinking, the behavior of those remaining is getting more and more desperate and aggressive. It is frightening that a minority of individuals are attempting to impose their beliefs on women who are exercising their right to choose when or whether to parent and on individuals providing legal medical services. This imposition goes far beyond our constitutional right to freedom of speech. It has extended to physically blocking access to medical facilities, invading clinics, destroying private property, harassing patrons of medical buildings and assaulting women.

We need strong legal measures to prevent this atrocious, illegal behavior. A message must be sent to Operation Rescue lawbreakers that illegal behavior will not be tolerated.

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LETTER—C26

As a counselor for the past two years at [ ] Women's Health Center, I am happy to share with you and members of the Supreme Court some of my experiences in dealing with anti-choice protestors outside our clinic. Since November of 1990, our clinic has been hit particularly hard with anti-choice protestors who blockade the clinic doors on days when abortions are performed. On these days, patients and staff members entering the clinic are called names, shoved, screamed at, surrounded and blocked from entering. This includes women who are coming in for routine gynecological

services. Every day I see the horror, fear and anger on the faces of our patients, their families, friends and partners.

I remember one young Hispanic couple in particular who came in last December. The woman was carrying a fetus which, through amniocentesis, was determined to be without kidneys. Their doctor told them that the fetus probably would not survive delivery, but would definitely not be able to survive on its own. Because protestors were sitting in front of our doors, myself and another staff member pulled the couple over the protestors and through the doors. You could see the shock and dispair, especially on the husband's face, who by now, was in tears. They told me that they wanted to have children, but under the circumstances, felt terminating the pregnancy at that point was the best thing. The people blocking the doors just made a very difficult experience even more traumatic.

Since November, we have had staff and patients slammed between the clinic doors or have had fingers, feet, and arms trapped in the doors as protestors pushed or leaned against doors. We've had protestors block the doors with parked cars to which they chained themselves. We've had our locks glued and doors cemented shut. In addition, we have 8-15 police officers at the clinic. Our police force in Milwaukee is already understaffed and overworked. This is a waste of taxpayer's money. Our clinic has been issued harrassment injunctions against several regular protestors, however, Milwaukee's District Attorney, Michael McCann, who is anti-choice, often overrules Judges' decision to issue on the injunctions.

The situation in front of our clinic is becoming increasingly volatile. It is just a matter of time until someone is seriously injured.

I feel strongly that these individuals have a right to pickett. However, they should be required to do so peacefully. They are not only denying my right to enter my place of employment freely, but also denying women from receiving gynecological care and from exercising their right to a safe and legal abortion.

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LETTER—C27

My husband and I often do escort duty at a clinic where they perform abortions.

I remember one particularly ugly protest. We were escorting in a tearful woman and her husband who had been waiting in vain for the protestors to disperse.

The husband told us that his wife was diabetic and had been advised by her doctor that an abortion was medically necessary. To carry the pregnancy to term would likely cost the woman her life, and she had made the decision to abort, thinking of her husband and their three children.

You can imagine what a difficult decision that had been for the woman to make. And now, as we escorted her to the door of the clinic, the crowd of protestors screamed the word "murderer" at her. Some kept pleading, "Mother, don't kill your baby."

This is outright cruelty. For the rest of her life that young woman is going to wonder whether the guilt they tried to heap on her was justified. Had she been selfish, choosing her life over her unborn child's? How many times that terrible scene will replay itself and she will wonder if she really is the monster the anti-abortionists say she is.

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LETTER—C29

In response to your request of April 4, I am writing this letter to relate some of my experiences with anti-choice demonstrators who are connected with Operation Rescue. I am a 56 year old woman, an active volunteer

in many human service and cultural organizations in the Dayton, Ohio community. Recently I received the "volunteer of the year" award from District 7 of the National Association of Social Workers. I have also been named as one of the Top Ten Women in the Dayton Area as well as receiving numerous other recognitions throughout the years. Governor Celeste of Ohio appointed me as one of 25 members of the Ohio Commission on Volunteerism. I tell you these things to establish that I am a credible person and highly respected member of my community.

In August of 1986, after viewing the activities of the demonstrators at a clinic in Dayton, Ohio, I contacted the clinic and volunteered to escort women from the parking lot into the building in an effort to protect them and provide support while they endured the unbelievable harassment of the demonstrators. I remain the ony clinic escort in the Dayton area. I volunteer two to four mornings a week at the clinic and have done so for almost five years, so I have had ample opportunity to observe these people.

My experiences brought me into daily contact with D[ ] S[ ], who is currently leader of the Ohio Rescue movement, D[ ] M[ ], director of "Project Jerico", D[ ] E[ ], director of "Choose Life Ministries", and hundreds of their followers. All of these people have been involved in Operation Rescue and many have been trained by Randall Terry and/or members of his group.

From the very beginning of my escort work and continuing to this day, I have been subjected to many types of harassment. Verbal assault consists of being called "murderer, butcher, garbage of society, vulture" etc. as well as comments about my personal appearance (hairstyle, clothing) and my lifestyle (the size of my home, the car I drive, etc.). There were numerous verbal threats made about my daughter, who was 24 years old.

Comments such as "we know where your daughter is, we know where she lives". They also learned the identity of her fiancee and in June, 1988 when she was planning to be married, the demonstrators threatened to "publicly embarrass" me by appearing at her wedding, forcing me to have police officers at the church and at my home where the reception was held.

Large color photographs of fetuses bearing the incription "Killed by you", as well as other anti-abtortion materials, were regularly left in my mailbox. Letters were written to the Presidents of Arts groups on whose Boards I served, demanding that I be dropped from those Boards because I was an "evil woman". When I served as Auction chairman of the local public television station, the station was harassed by phone calls saying that "you have a murderer as your chairman". My husband, an attorney, received letters from various anti-abortion leaders berating him for "allowing me to murder babies". I was followed on the highway by some of the demonstrators, who would tailgate me and/or pull in front of me, slamming on their brakes, all the while yelling out of their windows "murderer".

My home has been picketed on Saturday afternoons by as many as 30-35 people bearing signs saying "[ ] leads innocent children to their deaths" or "[ ], the Deathscort".

The harassment and intimidation at the clinic itself became so unbearable that the clinic was forced to file a lawsuit seeking an injunction—the injunction was granted. I was a witness in that lawsuit as well as subsequent contempt hearings, in addition to testifying in numerous trespassing charges brought in the local municipal court. When I sat in the courtroom after testifying I was verbally assaulted, pushed and shoved.

While carrying out my duties as an escort at the clinic, I have had a fetus in a coffin pushed in my face—when I

tried to enter the building to get away from the man who was carrying it, he grabbed my arm and pulled me off the step. On another occasion, the fetus was wrapped in a blanket and pushed in my face. This fetus, according to an interview given by D[ ] M[ ], leader of the Jericho Project, to the local newspaper was kept in a bottle of chloroform in M[ ]'s home. He boasted in the newspaper article that he had shown it to me.

On another occasion, I was walking with a patient to the clinic door, followed by a demonstrator (who was trespassing and violating the Court order). When I opened the door for the patient, the demonstrator grabbed both of us, throwing us to the graund, causing the patient to lose her shoes (to say nothing of the trauma she suffered). I have, along with the patients, been screamed at, pushed and shoved while escorting the patients through the parking lot.

There have been three "Operation Rescues" at the clinic where I volunteer. These have been the worst days of my life. On one of these days, I was standing outside the doors of the clinic when three buses pulled up and a large group of people (mainly men) came pouring out of the bus, ran to the front door and sat down in front of me, even sitting on my feet. When the police arrived they refused to move when requested to do so. I was eventually instructed by the police to step over them. At these rescues, clinic staff and myself try to protect the patients in the parking lot by encircling them. The demonstrators react by encircling us, pushing us out of the way to get to the patients, throwing literature at them and pulling and tugging at all of us. It is an unbelievably frightening experience. These are definitely NOT peaceful demonstrations.

The windows in the clinic have been shot out three different times during the night and it is also frightening to arrive in the morning to find windows shattered by

bullets and bullets lodged n the walls. The doors have been "super-glued" shut during the night time hours, the building has been covered with red paint, eggs have been thrown all over the building and the parking lot.

I do not believe that people have the right to blockade women's health clinics anymore than they would be allowed to barricade a bank's door because they didn't approve of the banking practices. "Operation Rescue" simply cannot be allowed to continue this type of horrendous harassment and intimidation of women.

I support women's reprductive rights and the right to choose. I am fifty six years old. Abortion was not legal when I was younger and I have personal knowledge of friends who were so desperate that they choose illegal, dangerous abortions. The mother of one of my friends died because she tried to abort herself with a feather and died of infection. I have always been very grateful that I was never in the position of having to make that kind of decision.

I could tell many stories of harassment of patients, but since you asked for stories of personal harassment, I have not included them. I could also tell many more stories of various incidents that have happened to me, but I hope this will be of some help to you.

By the way, I have no problem with my name being used in any way you choose and you have my permission to do so if you wish.

I currently speak quite often publicly about my experiences and/or pro-choice issues. The local newspapers and television stations also interview me about pro-choice matters. Of course, these always bring five a.m. phone calls with a male voice saying menacingly and deliberately "murderer . . . murderer . . . murderer." In other words, from the very beginning of my volunteer work at the clinic, every effort has been made to intimidate me, to

embarrass me, and to frighten me from continuing my work at the clinic. The demonstrators and particularly their leaders, are very unhappy that I am a very credible witness in court, that I am a respected community leader, that people listen to me and believe me.

My work at the clinic has brought me to NARAL. I am currently Vice President of NARAL OHIO and co-chair of our local NARAL.

Please let me know if there is any way I can be of help in the future.

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LETTER—C33

I'm writing to share my experiences with clinic blockades, with and without injunctive relief. I am Executive Director of seven ambulatory surgery centers that perform abortions. Six of these facilities have been blockaded by a group known nationally as Operation Rescue. All of the six clinics have been "hit" on more than one occasion. I was present for all but a few of these trespasses/blockades. The locations are: Alabama, Mississippi, North Carolina, South Carolina and Tennessee, and the years include 1988 to the present.

In February, 1989 I was contacted by Knoxville, Tennessee City Police Department and told that a national anti-abortion group planned to block access to my facility on February 4, 1989. The police officers explained to me that they had made several "deals" with the trespassers such as: 1. The leader would be allowed to orchestrate the "sit-in" and would not be arrested; 2. All individuals wanting to be arrested would be carried on stretchers in order to keep the clinic closed as long as possible due to the stretchers requiring more police officers per person; and 3. The bystanders who called themselves "prayer support", would not be arrested.

I questioned these "deals", and the officer explained that there was no way to prevent this huge group from

coming onto the property and the main concern of the police department was to avoid a riot and/or violence if several hundred people got out of control. That is what Operation Rescue had threatened if their demands were not met.

I stayed in the clinic all night before the blockade was to happen, waiting and worrying. At approximately 6:00 AM I went outside and talked with an officer who was passing by the area. I was told to meet the group of trespassers at the property boundary and inform them as they stepped onto the property that they were trespassing on private property and that I was asking them to leave and they would not be arrested if they left at that time.

My vision up to that point was that this was going to be some kind of symbolic sit-in. At 7:30 AM, approximately 350 people came marching toward my building in block formation, about twelve abreast. I met them at the property boundary with two private security guards and said what the police had instructed me to say. What a joke—not a funny one either. The mob pushed me all the way to the front door of the clinic and proceeded to pin me and the guards against the brick wall and door. There were thirteen female employees now trapped in the building. More of the group went and blocked the two back doors. (Our windows do not open for security reasons.)

I screamed toward the door to "Call the police!", hoping the employees could hear me over the cult-like chanting and singing of the trespassers. These people were physically rough and abusive to me and the guards. They hit us, they bit us, they pushed and shoved us. I was elbowed so many times I thought I would faint. Approximately thirty minutes later, the police arrived and began the arrest process. I asked them to please put an officer in my place so someone could continue to attempt communication with my staff. The captain felt

that this would further complicate the situation, so I stayed put. For three and a half hours I was against that brick wall and door while the Operation Rescue people held bibles up to hide their friends' faces on the bottom of the pile that were pinching, hitting and biting us.

I have enclosed photographs showing: 1. The crowd at the door, and 2. the bruises on part of my body resultin from the blockade and assault. The experience was a nightmare. I would never have believed something like that could happen in broad daylight in America. Incidentally, the clinic is a licensed, ambulatory surgery center regulated by the Tennessee Department of Health and Environment.

I responded to this invasion by acting within the limits of the law. I sought and obtained injunctive relief in Federal Court. Within a few days after the temporary restraining order became a preliminary injunction, Operation Rescue violated the injunction and were found to be in contempt of Federal Court. After being found guilty of contempt, *none* of the defendants have violated the injunction though they still protest and picket *lawfully* on a regular basis. The injunction only stopped the unlawful and violent activity. It has given me and others renewed faith in the American legal system as well as two years of relative peace.

We operate two clinics in North Carolina that have not obtained injunctive relief and they are continually attacked and vandalized. In March, 1991 a radical group known as "Lambs of Christ" pushed their way into one of the North Carolina clinics and twenty five people locked themselves together in the surgery area. It took the local police and fire department ten hours to cut them loose, and the cost the taxpayers was tremendous. A couple of weeks later, other members of the "Lambs" poured gasoline over a car's interior, parked it to block our clinic doors, and then locked themselves to it. Again,

police officers spent hours trying to unlock the offenders and arrest them.

In summary, I have had numerous opportunities to see how radicals act in the face of an injunction, and how they act when there is no serious consequences for their illiegal actions. The clinic injunctions work to keep the peace and still provide for legal protest activity.

Thank you for your time and your interest.

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LETTER—C34

In November of 1989 I went out two Saturdays in a row to help the Washington Area Clinic Defense Task Force defend clinics against Operation Rescue. It was a very sobering experience for me. I went with an open mind, fully convinced that the blocking of women's health clinics and the bullying of women should be opposed, but reserving judgement about the kind of people who would do these things. I still have an open mind, but the individuals I encountered the second Saturday at a clinic in [ ], Md. did not earn my respect, and the experience made me question why they would call themselves "pro-life."

I was one of the first people to arrive at the clinic. We linked arms and formed a line across the rear door. The clinic is in an office building and the doorway has several large panes of plate glass. Soon the people from OR came and lined up in front of us. They began pressing against us and somehow one of the clinic defenders fell or was pushed into one of the panes of plate glass and it shattered.

Luckily, the man was not hurt, but the partially shattered window with shards of glass hanging down posed a considerable danger to the people thronged around the door, especially because there was so much pushing in the tightly packed crowd and because all of us there on both

sides had such a high level of commitment to our beliefs that we were not going to just walk away. The danger was greatest for *us* because the window was at our backs and the OR people were leaning against us pushing us towards the doors. The police sent an officer in to the door to try to keep people away from the broken window.

I have been in several clinic defenses and there is always an extended period of standing sandwiched in a crowd with the OR people pressing against you. That day at [ ] was the worst I've experienced. I felt numerous times that the physical pressure would do some damage to my body. I was also very afraid, as I think we all were, that if the OR people kept pushing us against the doors another pane of glass might give. And the most disturbing and frightening thing about it was that when confronted with the prospect that we might get hurt, most of the OR people didn't seem to care.

We made numerous appeals to them to stop pushing. The police told them a couple of times to stop. But they kept the pressure on. At one point, I said, "If you don't stop pushing, someone may go through a window." A woman responded, "Oh, no one's going to go through a window!" I said, "someone *did* go through a window this morning!" She replied with a tone as if to say so what, "Well, I've gone through a window." A frequent response to our appeals that they stop was, "You're not in any danger. You can go home any time." To me that was like saying, "We're not threatening you. If we say 'I'm gonna hit you; that's a threat. But if we say, 'Move or I'm gonna hit you,' *that's* not a threat."

I believe very strongly in people's right to free speech and to protest and OR should be allowed to do that. But that is not their main business. Their main business is physically blocking access to a range of health care facilities for women and bullying and intimidation of patients, clinic staff, and pro-choice supporters.

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LETTER—C37

You asked for letters re experiences with anti-choice protesters.

I escort at Surgi-Center in Atlanta several Saturdays a month. A woman named M[ ] is there almost every Saturday morning (and clients have told me she is there some weekday mornings, too). M[ ] writes down the license tag numbers from all the cars parked in the clinic parking lot. Some of the clients who come from small towns are intimated by this. I went to some trouble to find out M[ ] name, address, and automobile license tag number. Now when a client or a client's friend says, "Why is that woman taking down my tag number?" I answer, "I don't know—but here is her name and address and tag number. If you are bothered in any way, you can give it to your attorney." Of course, I am only there some Saturdays, and M[ ] is there a lot more often.

A woman named N[ ] M[ ] came to Surgi a lot last winter and the first three months of this year. I haven't seen her in about three weeks—I think she is concentrating on protesting on weekdays now when there are no escorts present. N[ ] likes to stand at the waiting room window and sing "Jesus loves the unborn children." N[ ] also runs at cars that have pulled up in front of the clinic or in the parking lot and screams, "Don't go in there—you could die. That clinic isn't safe." N[ ] has a lot of urgency and immediacy in her voice as though she just found out the building was on fire. One Saturday I was walking a mother and her trembling teen aged daughter part N[ ] into the clinic, talking quietly to them. When we got to the door the mother said, "I wish you had been her yesterday. That woman (N[ ]) made my daughter feel so bad."

N[ ] concentrates on the youngest and most vulnerable looking clients. She tells the young men, "If you love

her, you'll get her out of there. She could die. That clinic isn't safe. If she dies, it will be your fault."

The anti choice protesters often tell clients that the clinic is about to be closed by the health department. Once (maybe more but I just know of one time N[ ] M[ ] demanded that a client parking in the clinic lot produce some identification. The client told us later she had no idea who N[ ] wa, but assumed she was someone in authority. When an escort came up to the car and N[ ] retreated the client was still fumbling in her wallet and said "Here's the ID that woman wanted."

All the anti choice protesters who come regularly have a printed list of "symptoms" that they say are experienced by women who have had abortions. When a protester chants these "symptoms" the effect is eerie, as though they are trying to lay on a curse. The "symptoms" include any discomfort that is likely ever to happen in life, such as headaches, cramps, bad moods etc. They also include a lot of discomforts that aren't likely to happen such as hallucinations, insanity, etc. I would say there are about 50 "symptoms" on their list and they follow a client from parking lot to front door, chanting all the horrors she will have to endure the rest of her life if she doesn't follow their advice.

On four separate occasions I have been physically threatened by anti-choice people while I was escorting, but I think three of those occasions were bluff. On December 1, 1990 the man who wasn't bluffing (in my opinion), walked back and forth in front of the Atlanta Surgi Center with a big sign on a heavy wooden handle. He shoved my repeatedly and said, "Stay away from me or you could fall and really get hurt" and "You could have a bad accident." He shouted at several clients, "So your going to pay to have your baby ripped out of you, eh?" We called the police and an Atlanta police officer walked this man 50 feet away from the clinic, read him the in-

junction, and told him not to come any closer. He stayed there awhile and since that Saturday I haven't seen him again, I am glad to say. A funny footnote is that when the police came, I said, "That man threatened me." The anti-choice protester was dumb enough to say, "I didn't threaten her; I just said she could have an accident. Anybody can have an accident."

Well, I could go on and on, but this gives you some idea of how things have been at one particular Atlanta clinic on Saturday during the last four or five months.

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LETTER—C38

Thanks a lot for letting me be a part of this. I have been escorting patients and "baby-sitting" clinics at least every other week since June of 1990, so I have had a chance to see at least some of what goes on.

In July of 1990 (2nd Saturday of the month), I was escorting patients at the [ ] Center in Dallas. Another escort and I were assisting patients to get into the back door of the clinic since the front was completely blocked by rescuers. Two male rescuers were sitting at the top of a very short (4 or 5 steps) flight of stairs between us and the door. They both stood up as we approached and refused to move when requested to do so. The other escort was in front of the patient and I was behind her. The other escort managed to push her way between the two men and to pull the patient with her as I pushed from behind so they could get into the clinic door. This so enraged one of the rescuers that he pushed me backward down the stairs. I was uninjured, except for an arm full of splinters from the wooden banisters and our patient made it in okay. A Dallas police officer was watching this entire performance. When I went over to him to complain that the rescuers were on private property and should not be allowed to push me or anybody else around, he said, "You can file an assault charge

if you want to, but it won't do any good." This officer was a regular beat policeman and was, apparently, completely in sympathy with the rescuers. When the Tactical Unit arrived, all of the protesters were removed from the clinic property. However, it was necessary to escort patients from their cars to the clinic with protesters trying to shove their way between me and the patient so they could "talk to her" and "give her something to read". This kept up from about 7:30 AM till about 2:30 PM.

In October of 1990 (again, a 2nd Saturday), I was baby-sitting a different clinic, which was then located in a one-story, multi-tenant building. I was patrolling outside of the building when 5 or 10 cars pulled into the parking lot in a caravan. I went outside, locked the two outer doors of the building from the inside and notified the clinic that we were under attack so they could lock the clinic door into the hall. The rescuers completely blocked the front door (10 or 15 strong). A clinic worker had to get out of the building so she could give the trespass warning, as is required by Texas law. We went to the back door where we were met by another pro-choice volunteer and an armed security guard for the property. A group of rescuers blockaded that door as well. When we opened the door so the clinic worker could get out, they attempted, by main force, to shove their way through the door so they could get to the clinic. We managed to prevent this, but I was bruised up pretty thoroughly and got my shoulder strained so severely that a doctor's care was required. I could not file charges, since several people were involved and, in that kind of pushing and shoving match, it is almost impossible to say who did what. We did have a couple of patients get through this group and into the building (ironically enough, they only wanted birth-control pills, not abortions), but they had to shove their way through by main force. Again, Tactical Unit showed up and arrested 14 of the protesters. A "fake patient" had gotten into the clinic and, when she came

out, unlocked the front door so that two protesters could get in and lie in front of the clinic door. They were both arrested, but filed police brutality charges. One female police officer was also scratched up and bruised in her attempts to remove and/or arrest protesters.

The instances of verbal abuse to patients are nearly endless. One of the hardest things I have to do as a volunteer is to keep the men who come in with patients from assaulting the protesters. In one instance, a 17 year-old came in with his girlfriend. The protesters started with the normal "Don't let her kill her baby", "Be a man—that's your baby she's going to kill", "God made her a mother for a reason" nonsense. The patient burst into tears and the boy finally turned to the crowd and screamed, "Let her alone. She was raped!" One protester shouted, "How do you know it's not your baby she's killing?" The boy replied, "Because I love her too much to sleep with her before we're married." It took all I had to keep him from rushing out into the protester group and just beating up on anybody who was there.

Patients leaving the clinics are also abused, primarily verbally. Some of them are woozy from anesthesia and nearly all of them are nervous and upset. The protesters try to keep them from getting into their cars until they take the literature advertising post-abortion counselling and hear that God will forgive them if they repent.

Thank you again for letting me contribute. I am enclosing my release form and I have no problem with your using my name. Please feel free to contact me if I can be of any further assistance.

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LETTER—C39

I am wishing to support the National Abortion Rights Action League's suit again "Operation Rescue" and provide eyewitness testimony that the group known as "Operation Rescue" and others acting in concert with them are

NOT a non-violent organization. I am a co-founder of the group, the Washington Area Clinic Defense Task Force (WACDTF), which is a coalition of pro-choice activists and organizations committed to defending a woman's right to choose abortion. I also have coordinated escorting on a weekly basis at [ ] Surgi-Clinic at [ ] Washington, D.C. for approximately six months. In this capacity I have come in contact with the organization "Operation Rescue" and its affiliates.

There have been several incidents that I have witnessed where members of "Operation Rescue" have acted in violent and physically abusive manners. There are several others that I have not personally witnessed but have encouraged those who have witnessed them to write in and describe those circumstances. In addition to the acts of outright violence that I have witnessed by members of "Operation Rescue," there is a constant insidious threat of violence that is always present during a "rescue" attempt. This tension and harassment often leads to violence and is much more difficult to document because it relates to the atmosphere engendered by the actions rather than the actions themselves. Nonetheless, this aspect is just as dangerous as the actual violence that does occur because it provides the climate for these actions to happen.

One Saturday in November of 1989 (November 16, I think) "Operation Rescue" instructed its members to meet outside of the National Air and Space Museum early in the morning. This was their designated mobilization point where they would form a caravan and follow each other to a predetermined clinic in order to shut it down. WACDTF learned of the mobilization site and deployed pro-choice activists to join in the caravan to arrive at the clinic when "Operation Rescue" did. My partner and I got to the Air and Space Museum around 6:00 a.m. Shortly thereafter we were recognized by members of "Operation Rescue" as pro-choice and our car was surrounded by anti-choice protestors and eventually boxed in by the vehicles of anti-choice demonstrators. My buddy for the day, [ ] got out of the car and was grabbed by three members of "Operation Rescue." One was a priest named S[ ] R[ ] (from [ ]). Two "Operation Rescue" members restrained [ ] while the priest punched him in the stomach several times. I approached two police officers on the scene to intervene.

In another incident, a carload of "Operation Rescue" members failed to respond to a police order to stop their car at the mobilization site for a "rescue" attempt in December of 1989. The "Operation Rescue" members actually drove their car into the police officer who was dressed in plain clothes. He got on the front hood of their car while they continued to drive on. All the time he was yelling "Stop, I'm a police officer" and flashing his badge. Other police officers in uniform approached and the car stopped. The "Operation Rescue" members clearly displayed with these actions that violence is O.K. Running people down with their car is condoned. Luckily, no one was hurt. The officer knew what he was doing and was able to handle the situation. If this was a pro-choice activist I don't know if they would have been able to protect themselves as effectively.

Several hours later the same day that my buddy was assaulted at the Air and Space Musuem, a member of "Operation Rescue" in his zealous attempt to get into [ ] Clinic pushed a pro-choice activist through a plate glass window. Most of this activity was captured on video tape and some of it has been included in the "Stand Up for Choice" film on clinic blockades. The "Operation Rescue" member is seen running up to the door of the clinic, he pushes pro-choice activists away from the door. He checks to see if the door is locked. When he realizes it is locked, he pushes his way past and runs around to the other side of the clinic to check the other doors. These doors are also locked. He returns to the first side of the

clinic. Here he gets on his hands and knees and tries to crawl through the pro-choice activists. He cannot get through this way so instead he uproots a shrub at the far left corner of the clinic door. Here in his zest to get into the clinic to destroy equipment, he begins pushing against the pro-choice activists. The wall of the clinic in this area is glass and it gives way underneath the pressure of this attack. A pro-choice activist is pushed through the glass; glass fragments go everywhere. A long sheath of glass is left hanging dangerously. The "Operation Rescue" member's response is to pull a plastic fetus out of his pocket and begin declaring how he is non-violent. This was by far the most dangerous and frightening situation WACDTF personally experienced at a clinic. Actions such as these can surely not be called "non-violent."

In another instance a pro-choice activist was beaten with a flashlight when she was taking pictures of "Operation Rescue" members at the hotel they were staying in Virginia on the weekend of an announced "clinic attack." She and her buddy were in front of the hotel with cameras photographing all "Operation Rescue" members who went in and out of the hotel. One man walked out and turned his back so they were unable to photograph him. The two pro-choice activists walked in front of him so they could take his picture. Whereupon he started punching and kicking on of the pro-choice activists. The other took pictures which are in custody of the police. The "Operation Rescue" member kept beating her and starting hitting her with a flashlight. The other pro-choice activist called for help and the "Operation Rescue" member ran away. The pro-choice activist who was assaulted by the "Operation Rescue" member was hospitalized for her injuries.

Even while escorting on a regular Saturday basis, instances of physical assault have occurred. One anti-choice protestor has grabbed hold of a young woman by the

sleeves of her jacket and refused to let go of her so she could keep walking down the sidewalk. This anti-choice protestor was a nun. Another anti-choice protestor who is a large man, runs up the street at women. These women are so startled by a strange man running at them, that several of them have darted into the street to try and avoid him. They run into the street without looking for oncoming traffic. This has led to close calls and the anti-choice activist has endangered the welfare of citizens by his aggressive actions. I have also been physically threatened while escorting. One week an anti-choice protestor was surprised to see us, remarking "What are you doing here? You're supposed to be dead."

During a clinic attack in Dobbs Ferry, a carload of pro-choice activists were confronted by an "Operation Rescue" member threatening to throw a rock through their windshield. Events like these are too numerous to mention. However, as I alluded to before the climate of hostility and anger which lurks behind the actual physical violence is equally as lethal at these brutal events. Because this tension has been realized in several circumstances by actual violent consequences, this threat of violence is incredibly powerful.

Don't be fooled by "Operation Rescue," they are NOT a non-violent group. Not only has violence occurred at their actions, but their intent is not for a peaceful demonstration. It is to provoke and push things to the extreme. I hope that the cloak that "Operation Rescue" is trying to hide behind becomes dispelled by this suit and their actions can be seen for what they are: violent and dangerous.

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LETTER C40

I was the director of a women's health clinic in the Detroit area from 10/88 to 10/90. During that time, my clinic was the target of repeated harassment from the local chapter of Operation Rescue. There have been hun-

dreds of arrests at this facility on charges ranging from disturbing the peace and criminal trespass to assault and battery. We have had bomb threats called in while the staff was trapped in the blockaded clinic. The effects of the activities of Operation Rescue have been profound. We have had to utilize volunteer escorts to assist our patients in entering the building. The patients are subjected to a steady barrage of harassment every step of the way until they have safely entered the building. But even then, there's still a good chance that one of the protesters will open the door and stick his/her head into the waiting room and shout a variety of epithets. On several occasions, one of the more disturbed protesters has chased patients and/or staff around the parking lot in his van, shouting out the window through a bullhorn. The staff calls the police immediately, but by the time help arrives the damage has already occurred. Patients frequently arrive at the front desk shaken and tearful. I felt as though I were working in a war zone.

In January, 1990, the local chapter of Operation Rescue subjected my clinic to a "siege". There were several full blockades of the clinic door, as well as daily large-scale protests involving 75-100 picketers and "sidewalk counselors". On January 9th' our physician called on his car phone and said he would prefer to avoid the circus out front and asked if he could come in the back door. I agreed and assigned my assistant director the task of informing the volunteer escorts at the back door of the doctor's imminent arrival. As she opened the heavy, steel firedoor, I heard her scream. Seven protesters had thrown their full body weight against the door to prevent the doctor's entrance. In the process, they had pinned the assistant director in the door and she was being crushed by the combined weight of the door and the people pressing against it. I wedged myself between her and the door in an effort to gain some leverage and relieve the pressure on her. She was freed, the door was opened a

bit more and the protesters grabbed my ankle and pulled me to the ground. I landed on my knee and twisted it badly. I was half in and half out of the building, and I was crying and begging them to let go of me because I was injured. Several people were laying on top of me and their faces were inches from mine. Nobody moved, despite the fact that I was obviously hurt. Eventually the doctor and several staff members were able to free me and drag me backwards into the clinic. The police arrested all 7 for assault and battery, but they have yet to come to trial due to delaying tactics employed by their attorney (including entering a defense that their actions were justified because they were "saving lives").

As a result of that protest, I have had to have corrective surgery to my knee to repair some of the torn tissue. I was unable to walk without assistance for seven weeks after the surgery. Some of the damage isn't correctable, and I now have arthritis in the joint. I have to have additional surgery to repair ligament damage to my ankle.

In addition, my assistant director received treatment for bruises and a twisted shoulder, and the physician injured his back.

Operation Rescue is full of people who behave violently and erratically. The far-right precepts of the group attract extremists. These people have threatened to picket my home. I'd like to share a story with you about how this has affected my family. My husband and I debated about whether to tell our children about the possibility of a protest at the house. We eventually decided that it was better to tell them than to have them be surprised. In the course of the discussion, my 5 year old asked his father, "Will they break our windows?" His father replied, "No, it's against the law." Then my little boy said, "Wasn't it against the law for them to hurt Mommy?" And his father said, "The police will protect us." My son said, "But they couldn't protect Mommy, and they

couldn't stop her from getting hurt." It was tough to find an answer for him.

Our nation's women's health centers, their patients and staff members are being victimized by a small extremist group. Operation Rescue is a terrorist group, utilizing violence and intimidation. They should be treated accordingly.

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LETTER—C43

In response to our phone conversation of April 27, 1991, I wish to document for your files the violent occurrences I have witnessed in regards to Operation Rescue's behavior.

November 15-17, 1990 Operation Rescue came to Washington, D.C. for D.C. Project II. Their goal was to blockade abortion clinics in the D.C. area, and receive media attention for their efforts. I am a volunteer participant for the Washington Area Clinic Defense Task Force (WACDTF). Our goal during these attacks was to keep these clinics open, assuring women of their reproductive freedom.

Thursday, November 15, 1990

Thursday evening I met my partener at the [ ] metro stop, and we headed over to where Operation Rescue was lodged during the D.C. Project II weekend. Our assignment was to photograph people involved with Operation Rescue to update our files. We were making our way through the parking lot when we saw two men approaching us. I agreed with my partner that I should photograph the one on the left, and she, the one on the right. I took my subjects photo, while my partner focused in on her's. As I lowered my camera, I saw my partner's subject—a man that we have identified as "Ed", one of Randall Terry's body guards—rush my partner, picking her up, and slamming her against the brick wall of the hotel. She got up off the ground, whereupon, "Ed" rushed her again, forcing her to the ground, kicking

her in the stomach, back, face and breasts. "Ed" then pulled out his metal flashlight and began clubbing my partner on the head and neck with the instrument. During this time, my partner had curled up in a ball, attempting to protect her head and body. I was photographing the entire incident. All the while, "Ed" was screaming at my partner that he was "going to kill her", calling her a "murderous bitch", "cunt", "whore" and "slut". I attempted to intercede, and "Ed" turned towards me with his raised flashlight, until my partner's movements brought his attention back to her, and he continued to beat her. I ran to get help, and upon my return, "Ed" had fled off into the parking lot somwhere. The [ ] police arrived, and I filed a report with them, and they confiscated my film for the trial.

Later that night, a new partner and I followed a van of Operation Rescue followers on a high speed chase across the [ ] bridge and into the city, eventually to arrive at Planned Parenthood at [ ]. During this time, the maroon van we were following repeatedly tried to run us off the road, not only endangering our lives, but the lives of the young people inside the van, and other commuter traffic.

Friday, November 16, 1990

Operation Rescue decided to hit a clinic at [ ]. later that morning at approximately 8:00a.m. In our attempts to gain access to the doors to maintain the clinic, Operation Rescue proceeded to physically prevent us from coming near it. The forcibly pushed us from the front lines, pushing and shoving WACDTF members from the property, leaving us helpless, with nothing to do except wait until the police arrived to take them away.

Saturday, November 17, 1990

Operation Rescue decided to hit the clinic at [ ] on Saturday morning. There were seven layers of people,

layered as in one row of pro-life persons, another layer of pro-choice persons, another of pro-choice persons, etc. so on and so forth. I was on the back lines with a smaller Operation Rescue man in front of me. During the six hours we were positioned there, the man repeatedly elbowed my breasts, or fondled them, stepped on my toes, or hit me in the stomach. I asked him to please stop, as he was hurting me, but he did not respond. A smaller woman two rows up from me was sandwiched between two Operation Rescue males, who linked arms, and repeatedly assaulted her from the front and the back. I attempted to have two of our people relieve the pressure from her, but they could not break the hold that the two OR men had established. When the woman was finally set free, and releases—after the police said they would begin making arrests—the women walked across the street, and proceeded to vomit for fifteen minutes, before she passed out—fainted—from lack of oxygen.

During the course of the weekend, other incidences arose where OR persons surrounded cars, preventing their movement towards the clinics, surrounded women patients, preventing their access to the clinic, and verbally and physically assaulted pro-choice advocates.

Both WACDTF and Operation Rescue groups claim the tactics of non-violence. However, OR's behavior during D.C. Project II indicated their ideology is anything but. The violence and brutality of such a movement should be stopped. Our right to choose between abortion or carrying a pregnancy to term should not be attacked, or denied by such violent means, if, indeed at all.

I hope my recollections have helped you, Ms. Murphy. If I can be of further assistance, please feel free to contact me.

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LETTER—C44

I am writing to describe some of my experiences with Operation Rescue blockaders (or those using similar tactics). I was an escort on several occasions for women (and men, at times) trying to enter clinics that were being blockaded by "protesters." (I also trained our local volunteers in escorting, legal observing, and non-violence during these blockades.)

As an escort to women (and their partners) who were trying to enter clinics, I can attest to the intimidation, harassment, verbal assaults, and emotional threats on patients seeking very personal medical care. Some examples may help. In Bellevue, Washington, I witnessed a woman who was in the advanced stages of pregnancy, in tears, trying to convince blockaders that she did not want an abortion, but needed to see her physician because she was not feeling well. Those who solidly blocked the stairway and entrance to the clinic showed no concern for her, her pregnancy, or her need for medical care. It was hours before she could enter and receive much needed care. (I later witnessed some of these blockaders at legislative hearings in our state capitol refer to cases like hers as "casualties of war.") At the same blockade, a young woman who had returned from college for the weekend, just to have her yearly pelvic exam and PAP smear, was unable to see her physician and had to return to college without seeing her doctor.

At other clinic blockades I have seen women being called names, having magnified posters shoved in their faces, and being presented with personal, unsolicited "advice and information" about the most personal of decisions. Women and their doctors were called murderers. I witnessed women who were afraid to leave clinics after their medical procedures, fearing what the "protesters" might say or do to them. Other women had to wait lengthy periods after entering clinics, in order for their blood pressure to return to normal levels, so that medical

procedures would not be unduly risky. Women who had taken special time off work and made special arrangements for childcare paid dearly for the extra hours it took to clear doors of blockaders. And I saw "sidewalk counselors" (always accompanying the blockaders) trying to be chummy and "helpful" to woman trying to enter the blocked clinics, by offering them coffee and/or doughnuts—knowing full well that drinking or eating food before a surgical procedure could put the woman at serious risk.

Somehow, as I write this letter years after the blockades took place, I'm afraid that the extreme toll, in terms of fear and intimidation, that the blockaders procured, will seem muted and trivial. Please realize that having to fight your way through people trying to block your access to health care is not only a draining ordeal physically, but emotionally, as well.

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LETTER—C47

I have been a volunteer patient escort at Planned Parenthood in [ ], Missouri for about four years. During that time I was at the clinic most Saturday mornings.

I have observed many instances of extreme and bizarre behavior on the part of the anti abortion persons. Verbal abuse is common and is directed at escorts, employees, patients and their companions. Often this abuse consists of derogatory remarks concerning race, sexual orientation, religious beliefs, age and motivation. These verbal assaults are by screaming or the use of amplified bull horns. Sometimes delivered from a distance of two feet or less. Often persons leaving the clinic are followed by protestors screaming and shouting.

Ingress and egress to the clinic is often impeded by protesters physically blocking the sidewalk or driveway.

The most frequent targets for these actions are women walking or driving alone.

I have seen protesters place themselves prone in the drive or public street in front of moving cars forcing the drivers to stop. Recently a protester's leg was run over after he placed his leg under the wheel of a moving vehicle. He is now bringing legal action against the driver!

Physical confrontations are not common in my experience. However, on three occasions I have been involved in such actions. Each was initiated by protesters placing their hands on me while blocking my progress along a public sidewalk.

At Planned Parenthood I have seen the windows after they had been shot out. I have seek buckets of blood and decayed animal parts that were thrown on the entrance. I have experienced the results of noxious chemicals introduced into the air supply system. I have seen junk cars abandoned in the PPH driveways and groups of prottesters chain themselves together blocking the entrance.

In short, the protesters behavior has been threatening, intimidating, and frequently destructive. An occasional arrest followed by a small fine seems to spur them on to greater excesses.

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LETTER—C48

On Friday, April 26, 1991 at 11:00 a.m. I had a regular scheduled appointment with Dr. [ ] Michigan) to obtain prenatal care for my impending *birth* of my baby on August 28, 1991. I have a risk pregnancy as I am of age 37 and have asthma. I had gone to have testing done at a local hospital (1 CVS test and 3 amnios) the previous months for genetic testing and this appointment was for continued and follow up care for my pregnancy.

As I arrived at the 3-story public office building, I noticed the parking lot was full and two [ ] Police Department cars were near the front door of the office building. I started to go in the lobby of the building and was told by Operation Rescue protestors that the building was closed. I said that I had a doctor's appointment and my doctor was waiting for me in his office. The protestors asked who my doctor was and I told them. They said that Dr. [ ] was not seeing anyone. I asked a bystander why, and who were all these people (the bystander happened to be a [ ] reporter). He told me about the protest on Dr. [ ] for performing abortion.

I then started to approach the elevator of the building to get to the second floor telling people that I was here to have to *have a baby not have an abortion* but there were protestors in the elevator, filling it up, and they pushed the stop button of the elevator so it would not go up. I then had several protestors come up to me and tell me I did not was to see Dr. [ ] because he was a baby killer. I told the protestors in the lobby again that I was not here to have an abortion, I was seeking prenatal care. They told me to go see someone else and then proceeded to give me pamphlets on free prenatal care and propaganda/pictures (disgusting) of botched up abortions. I happened to have my 12 year old daughter with me (and her friend) and the people approached her with these pictures also and asked her if she needed any "help" (thinking she was pregnant and wanted an abortion.)

I started to climb the stairs to the second floor. I was determined to see my doctor as I work full time and scheduling an appointment is hard for me (to take off work) and this was a holiday for me (Good Friday). Protestors were lined up and singing, blocking the stairs. I excused myself and pushed my way up the stairs.

I reached Dr. [ ]'s office where the entire hallway of the second floor was blocked by protestors. I went near the office door and several men blocked the entrance (door) by *laying* on the floor and barricading the entrance. I excused myself and told them I had to get in because I was having a baby not seeking an abortion. They told me not to see him, his office was closed and he was not in. I said I would see for myself and the protestors started *pushing me* and told me not to step on the men which were in front of the door (which I wasn't and didn't—being 4 months pregnant). Then I turned around to leave and the protestors pushed all around me so I couldn't leave. I told them I wanted to leave and let me out. After 3 minutes of trying to push myself out, they moved aside.

Meanwhile my daughter was being harassed by the protestors about "needing help" and I told the protestors that were around her that she was just with me on my visit but they continued to harass her and showing her pictures of the aborted fetuses.

We made our way down the stairs and entered the lobby and was approached by people in the lobby again. I told them that they were interfering with my rights to seek prenatal care at this doctor. I was then told that I should not want Dr. [ ]'s medical help because he is an abortionist (I later found out by him of his total practice, only 1% of this is abortions anyway—he is not an abortion clinic). I told these people that I didn't care and wanted his medical help.

They started arguing with me and one woman came up to me and started to tell me of her experiences with him and she would not let me see this doctor. A nun also started to give me a long lecture and pamphlets on right to life. I said I was going to have this baby, that I just wanted my follow up care.

I believe in pro choice—this is my right—and also it is my right to see what doctor I want to see without interference from anyone else. If these people are allowed to do this, telling me who is right and wrong then the next thing they will be telling me is what church, etc. I can go to. If I was raped or my baby was badly deformed (as I have 3 friends with babies of this nature) I would have an abortion. The cost to care for these children is so high and the State pays for a lot of it also putting strains on money, etc. This is my right. Also, if this was a strike against a company, it would be my right to walk across a picket line. These people would not even let me into the office door.

I approached one of the policemen that were at the building and I told him that these people were interfering with my right to see my doctor. He told me he couldn't do anything because it could cause a riot. At the same time I was complaining to the officer, a receptionist from a psychiatrist's office on the third floor was complaining to the officer about these protestors following their patients up to the third floor to this doctor's office when these patients had nothing to do with seeing Dr. [ ]. These people were on medication, etc. and were getting harassed by these protestors. The officer said he couldn't do anything because he couldn't follow every single person up into the building (No one was getting in anyway).

I left the building and came back several hours later when I saw the building parking lot was almost empty and no protestors were around. I finally did see my doctor that day and was told by his office that they were in the office at that time but couldn't get out, etc. because they were barricaded in the office.

I find this totally offensive in the right of my choice!

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LETTER—C49

I have worked at a [ ] Abortion Clinic since 1976. Feb. of 1991 was my first experience with a protest at my home in rural Wisconsin on a State Hwy. The message was clear of pure intimidation for me to quit my job. I have young children, felt invaded, vulnerable and more strong for the cause that people "like these" feel they could "force" me not to work where I choose.

My name was used on all the signs and 7 of the 10 picketers were *men*. I am convinced that I was followed home to locate me.

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LETTER—C50

I strated a general practice including 1st tri abortions 1 year ago, purchasing the practice of an elderly man upon retirement.

He, his practice of 15 years, his employees were *never* picketed, despite late 2nd tri abs. Upon arrival of a [woman] physician, we have had daily clinic harassment, weekly home picketing of woman physicians, women staff. Again, the male provider in town with 7 years experience has had 5 or 6 episodes of half-hearted home picketing.

Addendum:

We've had one clinic blockade, which lasted only 2 hours due to the heroic efforts of the [ ] Police Dept.

42 approximately those arrested for trespassing + resisting arrest have demanded jury trials to deprive the office of personnel to continue business.

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LETTER—C52

I have defended abortion clinics for the last year and a half, with the Washington Area Clinic Defense Task Force. During that time, I have witnesses many incidents of physical and verbal violence and harassment by

members of Operation Rescue, Project Rescue, and other anti-choice organizations toward clients, their family and friends, clinic staff, and pro-choice escorts, including the following:

—In November, 1989, over 1000 anti-choice protestors blockaded the entrances to the [ ] clinic in [ ] Maryland. The clients who were waiting to get inside were having second-trimester abortions, which means that the procedure had been started the day before and had to be finished that day. The clients waited inside cars which were then encircled by pro-choice activists, to prevent the anti-choice protestors from rusing up to the cars and yelling at the women inside. As each new client arrived, pro-choice escorts had to form a circle around her and lead her through a crowd of anti-choice protestors and T.V. news cameras to join the other clients and the clinic staff.

After many hours, during which the police arrested only a few of the hundreds of people illegally blocking access to the clinic—despite a Maryland law against blocking access to medical facilities—several of us took the clients and the clinic staff in our cars and left the clinic, hoping that Operation Rescue would also leave, claiming "victory." A few members of Operation Rescue pursued us for several miles. When we finally evaded them, we waited in a restaurant for several hours until the protestors had left, and then returned to the clinic. Three anti-choice protestors remained. As we ran from our cars to the doors, they rushed at us, jumped on us, and tried to knock us down. Only the presence of the pro-choice defenders and several armed police officers kept the clients and staff from being harmed as they went inside.

—Earlier, at the same clinic, a pro-choice defender was pushed through a plate glass window by an anti-choice protestor trying to push behind defenders to get to the

door. Fortunately, the defender who went through the window was wearing a bicycle helmet and so was not seriously injured. (I did not witness this incident, although I have seen it on videotape.)

—At many different clinics, I have seen anti-choice protestors engage in what they call "sidewalk counseling," ostensibly to provide women with information about alternatives to abortion. Many of these "counselors" show no concern for the safety of the clients, pushing and shoving them, stuffing literature into their pockets after they have declined to take it, blocking their path, and screaming at them.

The very presence of a crowd of protestors at the door of a clinic often intimidates clients; if pro-choice escorts did not approach them and offer assistance in getting inside the clinic, some of these women would leave without getting the medical care for which they came—which might be an abortion, a pregnancy test, a gynecological exam, or other form of health care.

The right to choose abortion, and to choose other health care, is meaningless to women who l[illegible]ally cannot enter a clinic. The protection of this right [illegible] responsibility of the state; unless this Court upholds laws and court orders which prohibit the blockading of clinics access, it will continue to fall to pro-choice volunteers to ensure that women can exercise their constitutional choices.

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LETTER—C54

I am a volunteer clinic escort in [ ], Pennsylvania as well as the political action chair for [ ] NOW. I have been active fighting to insure abortion rights since I was in high school and helped reactivate the NARAL chapter here in [ ]. One specific incident is hard to discern from the last six years. I have been called names, spit on, bitten, pinched, kicked, elbowed and punched and

once in Colorado Springs I was shot at by a so called pro-life sniper.

The incidents that seem to stay with me the most are the ones that involve anti-abortion protesters' children. These parents have no regard for the safety or well being of their children even as they scream . . . "I'll take your baby".

One of the clinics, Women's Health Services Inc., is located [ ]. The wind that comes off the river in the winter is numbing. The children frequently have neither hats nor gloves. In summer, the children play in the gutters as their parents harass any women that looks like they could be pregnant, anywhere from age 12-60. Also, the children are laid upon the hot sidewalk to nap in the sweltering heat. Another activity for these children is to use them as shields.

In the spring of 1990 Women's Health Service's had over two hundred protesters in front of the high rise office building where they are located. The escorts had formed a protective wedge around the patient and her friend. As we approached the entrance of the building the crowd of anti-abortion protesters swelled. They screamed at the patient calling her a murderer and they told her the abortion would give her brain damage, we pushed on. An escort to the left of the patient had his knee kicked out from underneath him, he fell to the ground. I was at the front of the wedge and was trying to avoid the men that attempted to obstruct our progress by standing in front of us. Suddenly an older woman pushed a small child in front of my legs. I had over 30 people pushing from behind and somehow I managed to not step on this child who surely would be crushed by the throng of people. I placed my hand on the child's shoulder and pushed her to the side as quickly and gently as I could. The police stood by and watched as we approached with a look of astonishment but they did nothing.

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LETTER—C55

For the last year, I have worked on behalf of women's reproductive rights, both as a volunteer and a paid staff members of Planned Parenthood of [ ]. I have escorted at Planned Parenthood's downtown D.C. clinic (at 1701 Q St., N.W.) on a number of occasions.

This past fall, Operation Rescue held huge demonstrations at Planned Parenthood's Q St. Clinic on two consecutive mornings. The street was clogged with demonstrators, police, press, and clinic defenders from 5 am onwards. Clinic patients were forced to come to the clinic at an extremely early hour. They had to make their way through throngs of people, often confused as to who was there to help them and who was there to hinder them. They had to duck under a police tape and have their name verified and bag checked at the clinic door. Once inside the clinic, they were not permitted to leave.

A number of patients ended up not showing or rescheduling their appointment for an abortion because of the ruckus and inconvenience caused by the demonstrators. Such delay only increases the danger to the woman of the abortion procedure.

I have witnessed how patients, upon seeing their entrance blocked, had to resort to calling the clinic from a pay phone at a neighboring restaurant to request that an escort come get them and accompany them to the clinic.

Both on these days of planned demonstrations and during "regular" days of clinic operation when we have our handful of regular protestors, I have witnessed abortion patients having literature thrust in their face as they try to mount the clinic steps, descend from their car or try to reenter their car. I have heard patients being harangued for not heeding their "baby's heartbeat." I have seen signs saying "Abortion Is Murder," & "Stop Baby Killing" accompanied by gruesome pictures of

fetuses. Such pictures not only upset and almost always *anger* the patients, but also often disturb the young children of the patient who may be accompanying *their mother.*

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LETTER—C59

My name is [ ] and I am an employee at [ ], a health care facility, in [ ], Texas. The below account of an actual act of terrorism which occured at our clinic on March 29, 1991, will probably sound like a horror story to you; and so it should. To myself, other employees of the clinic, our patients and their family members, this encounter with terrorist who call themselves protestors, was a horror.

At approximately 9:45 A.M. on March 29, 1991, a group of terrorist calling themselves "protestors", entered the [ ] Medical Building at [ ], Suite [ ], in [ ], Texas. These "protestors" entered on the false pretext that one female "protestor" needed a prengancy test. As this female "protestor" was ushered into the private lobby area for said test, she quickly jerked open the door to the outer waiting area, allowing her fellow "protestors" to storm in. the "protestors" forcably and violently rushed through the door, knocking three employees of [ ] Medical Group against the walls. There were approximately eight "protestors" who gained immediute entry to the private lab area of our health care facility. [ ], an employee of [ ] Medical Group issued a verbal criminal trespassing warning, asking the screaming "protestors" to leave the premises. Immediately, a scuffle started. One "protestor" grabbed an employee by the left arm, yanking her around in such a violent manner as to leave bruises on her arm. This employee, who had just had surgery on said left arm, also had damage to the surgery area. The "protestor" then proceeded to strike her twice in the ribs with a fist in an attempt to gain further entry into the lab rooms.

A second "protestor", who had gained entry by another door unlocked by one of his fellow "protestors", struck another employee full force in the eye while aiming the blow at a patient. At this point, patients were running in an attempt to escape the "protestors", while employees and family members tried to protect them. The "protestors" were shouting their personal beliefs about abortion, accusing the patients and their families of hidious crimes. They (the "protestors") verbally attacked the patient's personal right to be at the Clinic in an extremely violent manner; also verbally attacking their families personal beliefs. The scene that followed was a complete fiasco. At this point, I was struck many times in the sides and stomach by arms and elbows of the "protestors" as the swung blows at my fellow employees. Approximately, forty patients and their family members were in the clinic at this time. The "protestors" who had gained entry into the private lab area, pushed and shoved their way into the lab waiting area. At this point, approximately sixteen "protestors" had gained entry into the private lab area. While some protestors were striking blows, other were shoving, shouting religious beliefs, shouing scriptures, condemning patients and their families, shouting slogans, singing songs, verbally attacking employees, and violently verbally attacking patients. Employees of the clinic, extremely concerned for the patients safety, were attempting to seperate the patients from the violent attacks and secure them in a safe area away from the "protestors". The "protestors" were pushing and shoving, trying to follow the patients all the while screaming at them. At this point, the patients were crying and the look on their faces was one of total disbelief.

The male family members of the patients; fathers, husbands and escorts; although seemingly not as afraid or emotionally stressed, showed complete fury at the situation. They defended their rights and the rights of their daughters, wives and girlfriends to make their own choice to the screaming mob. At the same time, they

were still attempting to physically protect the patients bodies from the physical assaults of the "protestors". The aggressive nature of the "protestors" almost made this a physically impossible feat. One father, as the "protestors" shouted their attacks at his daughter, finally became physically violent. This father had come to the clinic with his daughter, who was a Middle School student. He shouted back at the "protestors" asking them "what made them think that they could possibly understand his situation or know what was right for his daughter and family in this given situation". This man was so emotionally distraught that there are no words with which to explain the extreme duress he and his family were going through. The husband of a young black woman was also shouting back at the "protestors" telling them that they did not understand the difficulty of raising, supporting, emotionally supporting and giving enough love to the four children he and his wife already had at home. He told the "protestors" how the government was already having to help them financially and that this decision, made by he and his wife, was their personal right giving the "protestors" no right to interfer. Other men were screaming out their situations in defense of their families basic right to make this choice. While the shouting, pushing confrontation continued, the employees of [ ] Medical Group were finally able to secure the extremely emotionally upset patients in a safe and secure area. All employees at [ ] Medical Group are women who were certainly no match for the six foot male "protestors" who were attacking us as well as our patients and their families. Out of the group of "protestors" who gained entry to the private lab area and were physically and verbally launching this attack, only one was a woman.

We, as a nation, have just lost valuable lives in the Middle East, defending freedom. For terrorist calling themselves "protestors" to think that they have the right to put their own personal beliefs or ideas on another

family that is trying to handle their own personal and private affairs in the best possible way for their families is appalling. I personally cannot understand how, here in America, we can allow religious fanatics who feel they have the right to try to force their personal beliefs on others to cause such acts of terrorism as the one displayed at our clinic. To interfer with basic family planning would allow others to cut to the very core of family life. In a clinic such as ours, we see many different family situations which explain reasons that women have made this choice. These reasons include financial, emotional, ability to care for existing children and in some cases are drug related. These women are trying the best way they know how to make the most difficult decision of their lives at a time when they are already emotionally stressed by their situation. Before they enter our clinic, they have already had many family discussions and disputes over the situation they are in. This is especially true of parents with young girls who have been on drugs and feel that it is better for a decision to be made now. For terrorist, calling themselves "protestors" to enter and physically/verbally abuse these patients at a time such as this is the height of total cruelty. These so called "protestors" show a complete lack of human caring and character beyond compare.

As a health care facility, the emotional health of our patients and their families is of the utmost importance. These "protestors" care nothing of our patients health wheather emotional, metal or physical, as is shown in the above incident. Their ("the protestors") only interest is in attempting to force their personal opinions on patients at an extremely crisis filled time in their lives. If something is not done to stop these acts of terrorism now, it is apparent that the violence will increase until it is completely out of control. Americans depend on our court systems and political networks to protect American lives not only on foreign soil, but also, here in America.

To be given the right to protest, non-violently, outside a clinic is one thing. But when courts allow terrorist to enter into the privacy of a health care facility, to physically as well as verbally terrify citizens, one begans to wonder what has become of human rights. Through out this letter I have referred to these so called "protestors" as terrorist. Websters Dictionary defines "protest" as; to state positively, to "speak" strongly against, to express disapproval, to object, a formal statement of objection. Websters Dictionary defines "terrorism as; the use of force and violence to intimidate causing intense fear. What was experienced at the [ ] Medical Group on March 29, 1991 by employees, patients and their families most definately fits the definition of "terrorism" more fully than that of "protest.

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LETTER—C61

On Saturday morning, February 7, 1987, I arrived at the [ ] Gynecological Center on [ ] in [ ] Connecticut. I was schedulled for an abortion later that morning. A this time, I was seventeen years old and in my senior year of High School in a nearby affluent suburb. A couple of weeks earlier I had made the decision to tell my parents about my unplanned pregnancy, knowing that they would be supportive. That Saturday morning I was accompanied by my mother and my boyfriend at the time. The first thing I saw as we enterred the parking small parking lot was a mass of people (men and women) moving about the lot with signs and pamplets in their hands. I began to get concerned because I had heard about anti-choice groups picketing and bombing abortion clinics so I asked my mother if she knew who they were. She glanced about nervously and told me not to worry. Obviously something was wrong.

As soon as we got out of the car a group of people rushed over and began shouting, "Don't do it", "Don't

kill your baby" "Please, there is still time", "Let us help you". I just stood there in shock; my mother and boyfriend quickly guided me toward the clinic door. Then all of a sudden, my arm was grabbed by an older man with white hair begging me not to go inside. People were still chanting and yelling things about killing babies. My boyfriend grabbed me and hurried through the door, quickly shutting it behind us.

Once inside I could still see sillouettes of people with signs through the sheer curtains—their voices muffled. My eyes began to fill will tears, tears of fear and tears of anger. "How dare they harass me, grabbing my arm; as if this hasn't been a hard enough decision for me to make." My mother hugged me and said, "I'm so sorry you had to deal with this. It's not right."

Reflecting on this experience four years later has evoked feelings of anger and outrage. There is absolutely no excuse for the hostile, intimidating behaviors that these anti-choice protestors direct toward women seeking abortions. The court order which prohibits anti-choice groups frokm blockading women's access to abortion clinics must be upheld. *No one* should have to go through what I did.

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LETTER—C62

I have been a volunteer "escort" at [ ] Center, [ ] Womenservices, [ ] since October 1988. In my capacity as "escort", I have witnessed the persistence of anti-abortion protesters. As patients are offered literature and advice, they usually walk away briskly, trying to avoid eye contact. I have even seen some push them away and have stepped between a protester and a patient's companion to stop him from punching one of them.

[ ] Center is in a medical building with many doctor's offices. The building has a private parking lot which the anti-abortion protesters routinely invade. One

Saturday, I saw a middleaged man with a very young girl as they were approached by a protester who was holding out his literature with pictures of fetuses on it. The man said "Please leave us alone, we are going to the dentist. My daughter is only 12 years old." The protesters continued to press the literature on them saying "Take it. You may need it some day."

[ ] Hospital is across the street from [ ] and many visitors to the hospital park in the medical building's lot. They area also accosted by the protesters and anyone who looks like they are of childbearing age is assumed to be coming for an abortion. Even people who work in the building are not safe. They are approached many times before the protesters recognize them.

The protesters stand on the stairs where there is little room to pass. One of them usually has a camcorder and videotapes patients. This is one of the most instrusive and upsetting things I have seen so far. The patients are afraid that they will see themselves on television, maybe the evening news!

At [ ] Womenservices, the parking lot is protected with a security guard posted so no one can trespass. However, I was there on Oct. 29, 1989 when "Operation Rescue" staged a blockade. There were about twenty people at the front door and about fifty people at the rear door. There were also many people with protest signs around. Many walked in the driveway and when people tried to enter the lot, they fell to their knees or threw themselves on the hood of the car prenteding to be hurt. It was very intimidating to the patients. The protesters stopped cars in the street and told them that the clinic was closed. (I have even seen them do this when the clinic was not being blockaded). The "escorts" were doing their best to help patients by rerouting them to the other clinic at [ ] which was open and giving them the telephone number of [ ] Womenservices in case

they wanted to reschedule their appointment. Some came by public transportation and were being harassed until we got them in one of our cars and took them over to [ ].

J[ ] E[ ] and P[ ] S[ ] were bargaining with the police. The lieutenant told J[ ] E[ ] that they were shorthanded because one of the policemen's father had died and they needed the policemen for his funeral cortege. He asked them to take this sad ocassion into consideration and stop the blockade. They agreed and left the door. As patients started to arrive from [ ], the protesters all ran to the door and quickly blockaded it again.

The police told us that they were waiting for a school bus to take the protesters away. The school bus finally came but then they said they needed a photographer to take pictures of them as they were arrested.

The police finally started to arrest some of them and put them in squad cars. There were three cars lined up but the protesters would not let them out of the driveway. One of the policemen told me that they didn't want to take sides. When I said that I assumed that he would be on the side of the law, he just shrugged his shoulders. One policeman asked when "Dr. Hoover" would get there. (a reference to Hoover vacuum). One lieutenant said they should be out chasing "real criminals like rapists who are supposedly a cause of all these abortions."

A patient got very restless and desperate and decided to try to walk over the protesters to get to the door. As we walked over to her to advise her that the door was locked and she couldn't get in, we were warned that if we took one more step we would be arrested. They then removed her from on top of the protesters. She then told us that she had six children at home and wouldn't be able to get back to the clinic since she lived 2½ hours away and didn't have a car. She had been able to get a ride

this time but couldn't get one again. Abortion is no longer available in her community because doctors who did them were picketed and harassed until they stopped doing them.

We had to encircle a woman who was being harassed until she was sobbing uncontrollably. She explained to us that she was only getting an abortion because she had taken accutane which causes birth defects.

There was also a laminaria patient who had to have her abortion completed that day or she could have had serious complications.

When the doctor came, P[ ] S[ ] and T[ ] C[ ] lay on the driveway, stretching across it so that he could not enter. They were arrested and taken downtown to be booked but were never charged. We stayed in the parking lot until 5:00PM when finally the protesters just got up and walked away from the door with the policemen watching them. Since local police cannot seem to handle these large demonstrations it seem to me that the only deterrent is an injunction that prevents this type of action. Since we have had the Temporary Restraining Order, there have been no blockades although one was planned.

P.S. There are so many stories of the harassment of women at the clinics but I don't have time to write a book!

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LETTER—C65

My name is [-], I am the director of [ ] women's Health Center, in [ ]

Since August of 1990, and up to the present date, Every Tuesday, Thursday, and Friday, on the days that we do therapuetic abortions, we have anti-abortion protestors at our clinic.

They do not protest within our local law on the public sidewalk.

We have a private parking lot in front of our clinic, and it is posted as such according to [ ] city ordinance. The protestors wait for a patient to arrive, several approach her car, and then as few as 1 or as many as 15 will sit down on the sidewalk in front of the door, and physically block ingress to and egress from the clinic. The patients have to stand outside on the parking lot, and have to wait until the police remove them from the front door. In the meantime other protestors called "sidewalk counselors" swarm all over them, trying to get them to take false information and trying to dissuade them from entering the clinic. The show them pictures of dismembered and decapitated fetuses.

I am out on that parking lot three days a week from 8am to 11am, while the police arrest these people. I have seen patients and their guests harassed and intimidated. I have seen them in tears, I have seen them physically pushed and pulled away from the front door.

Since August 1990, the police have arrested over 800 protestors at our clinic, with a cost to the city tax payers of over 10,000 dollars a month, for the police manpower it takes to arrest these chronic violators of the law

Women who choose to enter clinics for legal abortion, do not have to answer to these religious fanatics who claim to be missionaries for the pre-born.

When I am on the parking lot, they call me a murderer, a baby killer, the daughter of satan, they kneel at my feet and excommunicate me for the Catholic Church. They condemn me to hell. I also have been physically pushed on many occasions when I been with patients.

On several occasions we have had cars pushed up against our front door, with the protestors chained underneath. This is not an unusual site for most clinic

directors. They hand out fliers, like the one I have enclosed. I cannot believe that anyone can justify these actions If they would do the same to any other private establishment, their punishments would be more severe. The Supreme Court has made blocking ingress and egress to a private building not constitutionally protected. So why do we still have to be harassed and intimidated/

A womens right to travel freely without being obstructed or hindered, choice of occupation, and place of employment, are rights that are affirmed and guaranteed under the constitution. Most of us have lost those rights.

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LETTER—C66

As a physician in [ ] Georgia, I have been the object of anti-abortion protests since August 1986. The anti-abortion protesters apparently are seeking to intimidate any qualified physician who is willing to make public the availability of abortion services. The protesters have successfully intimidated the Mayor of this small city located within the metropolitan Atlanta area and the Police Chief as well. It is seldom that we have any significant action by the Mayor, the Police or the County law enforcement officials in regards to their criminal activities. The patients are subjected to whatever tactics the protesters wish to pass out on any given day. The protesters only fear Federal law and Federal authority. The protesters are now aware that they have nothing to fear from local political or legal authorities. Patients can now only hope that Federal law will continue to provide them with some access and protection as they seek adequate, safe surgical care.

On August 9, 1986, approximately 50 protesters assaulted employees and forced entry into all areas of a state licensed surgical clinic which provides abortion services. The entire surgical process was completely

closed because police were unable to remove the individuals. Outside the building, all driveways and streets were completely closed by more than 300 protesters who had gathered for a planned event. Only ten of these individuals were arrested and ultimately were given the minimum sentence of $200.00.

The protesters have been so successful politically against local authorities that they have forced them to deny the local police officers the right to work as security guards for my surgical facility. It is only through the fear of Federal intervention that I am able to continue offering surgical services for abortion patients.

On August 16, 1986, six men came into the Reception Area of my surgical clinic and chained themselves to furniture and a water cooler and had to be physically removed from the building by police. During this invasion of the building, more than 200 people blocked all access to streets and driveways including public passage of sidewalks and streets.

In December 1986, a large number of anti-abortionists successfully blocked the street and driveways to the surgical clinic causing a three car accident. Protesters were not charged by the police for causing this accident.

On May 3, 1987, approximately 80 anti-abortionists in teams of 20 per group physically blocked the driveways and streets to the surgical clinic. The police were aware that this activity would take place but made no effort to stop the criminal trespassing. As each twenty would be removed from the driveway by the police, another twenty would be allowed to enter and take their place. The streets were completely blocked as these individuals lay in all directions.

Since February 1988, the entrance to parking and the dirveways to the surgical facility have frequently been totally blocked by the dumping of garbage, large one ton

air conditioners, heaters and water heaters that completely prevented entrance to the property. These were dumped there by anti-abortion protesters to prevent the facility from functioning on that day.

In December 1989, the Atlanta Gas Light Company's meters and pipes were completely disconnected from the building and more than 200 anti-abortion protesters blocked all driveways and doors to the surgical building. During this particular protest and in the presence of police officers, all of the building signs were removed and destroyed by the protesters. Cameras were used to record the identification of patients and some patients were physically threatened if they continued to try to enter the property.

On December 29, 1989, approximately two hundred protesters successfully blocked the public street, the driveways to the surgical clinic and all doorways to the building. During this incident of criminal trespassing, the Atlanta Gas Light Company's meters were completely removed from the building. The Georgia Power Company's electrical power meter was torn from the building and the power lines to the emergency generator which provides life-saving power for patients were cut and destroyed. These criminal activities took place during the time that more than 40 policemen were on the property but made no effort to remove the individuals from the property. After several hours, approximately 20 of the individuals who did not voluntarily leave after four hours were removed and were identified as residents of at least eight different states throughout the United States. These individuals have been brought to Atlanta by Operation Rescue for this particular event.

Every day that the surgical clinic offers abortion services there are protesters attempting to prevent patients from entering the building and parking areas. On Saturdays, there are ten to two hundred individuals engaged in criminal trespassing and blockade actions with very little

prevention available from the local police authorities. These individuals have no fear of local authority and their activities will undoubtedly result in ending all safe surgical procedures by qualified surgical centers. It is only the fear of Federal action and authority that has prevented them from making more aggressive moves in my particular geographic area.

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LETTER—C74

I was present at a half-dozen or so clinic blockades in the Washington, D.C. area between April 1989 and November 1990.

I remember O.R.'s pushing and shoving and kneeing and elbowing, as they charged in large numbers through and over lines of pro-choice volunteers toward clinic doors and entrance ways. I remember O.R. "crusaders" shoving small plastic fetus-dolls in my face, and screaming at me, calling me a murderer.

I also remember the faces of patients arriving for appointments, seeing the blockades and having to react immediately. These were women's faces showing fear and confusion, panic and crisis. If they summoned all their courage and tried to get inside, with the help of escorts, O.R. still pursued them, chasing, yelling and grabbing. Many women simply turned around and went home.

One occasion, several women had to wait all day at a nearby restaurant until O.R. left the clinic premises. Because of the nature of their particular procedures, it was critical for them to see the doctor that day. When they returned to the clinic, after dark, they were physically and verbally harassed by O.R. people who had remained on site.

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LETTER—C75

Since June 1989, I have witnessed six anti-choice protests outside abortion clinics in the Washington, D.C./

Baltimore, MD area. Some were large, nationally focused events, and some were small and more localized. I attended to give support to patients exercising their right to choose and was clearly a pro-choice demonstrator and female- acting either as an escort, an observer, or peacekeeper.

I was not prepared for the first "clinic blockade" I experienced. I expected a non-violent sit-in similar to the civil rights protests and anti-Vietnam war protests of the 1960's and 1970's. I was very wrong. As soon as I arrived at the clinic, I could feel the tension. One of the first things I saw was a placard with bloody photographs on it. These photographs supposedly depicted aborted fetuses, but I suspected they had been doctored to increase their shock value. When I looked closely at them later (after my initial shock) they looked far too developed to be 1st trimester embryos.

I moved to join the pro-choice sympathizers who were near the doorway of the clinic. The anti-choice protesters were beginning to gather in the walkway- to the clinic. As soon as a large group had gathered, one of the leaders, a man, signalled them and they all sat down in front of me. They began to sing and pray in unison. As other pro-choice demonstrators arrived, they were prevented from joining our group by this group of blockaders. At a signal from the leader they all stood and forcibly pushed pro-choicers (and at least one patient) back while calling them "baby killers" and murderers and "pro-aborts".

As the day wore on the tension increased. I was pressed against the front row of anti-choice demonstrators, and one young man in particular started accusing me of things and verbally attacking me personally. He called me a selfish yuppie who wanted to live life without responsibility as well as a "baby killer". This especially hurt me because I had fairly recently nursed my mother and my best friend during their terminal illnesses. They

had both died of cancer 6 years apart. My first thought was to explain to this man that his accusation wasn't true, but I could feel the tears about to come up. Then I looked into his face, and saw that he wasn't seeing me as human being, but a target for his anger. I looked around, and saw others on his side following his example, and people on my side were responding. Some with debate, some with anger. It seemed to me that this kind of verbal abuse of us was a tactic that helped to escalate the tension. Another pro-choice demonstrator attempted to join our group by the door to the clinic during all this. One of the anti-choice protesters began kicking and stomping on our feet. He stomped on mine and my toes were black and blue for a year. Some people from our side started kicking back. It was very scary and certainly not "non-violent". Eventually the police forced their way through the mob and took away a couple demonstrators from each side.

After this, the police brought a patient up to the line of anti-choice protesters to see if they could get her through. Anti-choicers on the sidelines were yelling at her, and she looked scared. The anti-choice folks in the walkway were sitting on the ground again singing and praying. When it became clear that they were not going to let her through, arrests began. The arrests took several hours. The police finally got to us and we left peacefully.

After all this I was exhausted emotionally and physically. I can only imagine what it must be like for a patient who has made a difficult decision when she faces this chaos. Maybe she's only able to get to the clinic on a Saturday because she works. Maybe she is near the end of her first trimester because she wasn't certain she was pregnant. Maybe she's been sexually abused or raped. In these situations a person's individual humanity is lost, and a crowd mentality take over. It's ugly on both sides.

My other experiences at clinic blockades were basically the same. The feeling of shock and assault never altered. I've seen patients reduced to tears by the assault. They leave and both sides claim victory—one says another baby was saved; the other claims that she went to another clinic.

I just don't think that the debate about abortion should take place directly outside the clinics. It isn't fair to the patients. It's illegal to interfere with patients going into a hospital why should any medical facility be any different?

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LETTER—C76

You requested information about the experience of our client, the [ ] Womens Health Center, and its patients with anti-abortion demonstrators. As I mentioned to you, members of my firm were present throughout all of the demonstrations.

The demonstrations were orchestrated by a small cadre of people determined to disrupt the services provided at our client's full service health facility. Since those attempts were unsuccessful, the demonstrators increased the level of their actions with more inhuman and illegal conduct.

On several occasions, the demonstrators barricaded the Health Center in unsuccessful attempts to prevent its operation. In addition, patients were accosted and subjected to obscenities being screamed at them. [ ] is very fortunate to have a responsive police force and supportive community, which greatly assisted the efforts to continue providing essential medical services.

There are many instances that I recall involving offensive actions by the demonstrators. These include attacking young children who came to the Health Center with their parents, attacking patients entering the Health Center, and assaulting [ ] police officers. The demonstrators have no regard for other people's dignity or the law and have refused to comply with numerous court orders including the imposition of fines and other penalties.

The situation peaked two years ago when the demonstrators invaded the Health Center and entered the examination room of a patient undergoing advanced invasive cancer testing. In addition, during the same time period, the demonstrators picketed a judge's home and made anti-semitic comments to him in open court. These actions were orchestrated by several professional demonstrators who came from out of state. They have been arrested numerous times over the last few years and, on this occasion, they spent several months in jail for their refusal to identify themselves to the court. The State of [ ] incurred a substantial expense.

These extraordinarily offensive actions brought an even stronger public reaction against the demonstrations. While we expect weekly picketing to continue, the public support for our client appears to have quelled the repeated illegal and offensive actions of the demonstrators.

LETTER—C77

For the past couple of years I have been a Pro-Choice activist and have witnessed numerous examples of violent behavior by the Operation Rescue faction of the Anti-choice movement.

One of the more horrific examples of the OR's harassment of women seeking health-care services occurred at the Westmoreland clinic. While Pro-Choice activists attempted to escort a patient through the human "corridor" and into the blockaded clinic, OR members attempted to physically prevent the woman from entering the clinic. The mauled and pawed at her, finally managing to get their hands on her and lift her above the crowd with their outstretched arms. Their goal was to raise her above the level of the chain-link fence and deposit her on the other side of it.

As you can imagine, the patient was wailing and shrieking during this attack on her body and Pro-choice activists struggled to pull the OR members off of her and protect her from the mob. I witnessed this from a distance of about twenty-five feet and was unable to determine what the outcome was. However, I will never forget the sound of the woman's screams as she was physically molested, stripped of her dignity, and denied her constitutional rights.

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LETTER—C79

For 3 years I had been a volunteer clinic escort. In those 3 years I have seen much harrassement, but I will never forget the summer of 1989. That summer operation rescue bombared our clinic many times. I was standing near the entrance of the clinic, helping people coming into the clinic from the street. I was face to face with the anti protesters. From experience, I was used to their hatred and intimidation. A man was standing by the fence, with 2 young children. The girl was maybe 6 and the boy no older than eight. They stood on either side of this man, just watching everything. I assumed the man was their father. I was wearing a hat for protection from the sun and had taken it off to wipe my forehead. The man yelled out, to me and especially his children, "See that red head? If you ever see her on the street you can kill her, because she's no good and she kills babies." I'll never forget those words. He said it with such force, that for a moment I was scared. I had never been threatned before and I was nervous. In that one moment this man was teaching his children to hate and kill anyone who differs from their opinion. As my knees shook, I stood there, knowing there was nothing I could say.

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LETTER—C80

I am writing you as both a pro-choice activist and as Coordinator of [ ] RCAR. My experiences with "clinic defense" have been in the official capacity as Coordinator.

In [ ], we participate in what RCAR calls *Operation Respect.* I am including our guidelines which are stricter than most. And, we try as much as possible to strictly enforce these guidelines. Our presence at clinics is silent, peaceful and supportive. Therefore, we do not actually "defend" clinics, but offer support to clinic defenders and our hope is to show the defenders, the women patients and the police that there is another religious viewpoint regarding abortion.

However, even though we do not do direct clinic defense, we are frequently targeted because we hold "Prayerfully Pro-Choice" signs and this seem to irritate Operation Rescue and other clinic blockaders to the extreme.

The really physical incidents that I've experienced are as follows: 1) A woman holding a very large crucifix (about 4' high) repeatedly spat in my face, on my shoes and then began waving the crucifix at me, as if to hit me; 2) A man in army fatigues (boots and all) blocked me and stood with his face in mine, repeatedly cursing me. When I reminded him that there were about 150 policemen around us, he gave me the finger and backed off; 3) I was surrounded by a group of about 30 people and not allowed to move down the street. One woman told me I should get out. It took me a minute to realize what was going on and I began to panic a bit when I realized they were moving in tighter, and I couldn't move. I kept saying "Excuse me, could you let me through", but it wasn't until I began yelling it and some police on horseback began moving in our direction that they began to move away; 4) Walking down the street with three middle-aged Methodist women, all of us holding the signs and a large church banner, we were followed by four

anti-choice protesters and called "witches, lesbians and whores" and then told "you sleep with every man in town and then kill your babies". One of the men who was the most vocal, came up behind one of the women and was yelling in her ear. I kept telling the women to ignore him and keep walking. Finally, a mounted policeman turned his horse around and stopped the anti-choice group and instructed them to walk twenty feet behind us; 5) While giving a press conference a man began swinging his sign at me and ended up hitting a woman who stood between us (this I have on tape).

The majority of the abuse I have received has been verbal. I am of course, called a whore, a slut, a baby killer, and satanist; I am told I am going to hell; I have been called anti-christ. I have been told "What if I kill your daughter, then how would you feel?". (Since I frequently mention my children when I speak and debate, I don't necessarily take this question as purely hypothetical).

I understand that this is an emotional issue and that people will do and say things they wouldn't do and say otherwise, but as a Christian and as a Methodist, I am appalled by the behavior of those who would claim to be my Christian brothers and sisters in other circumstances. I see absolutely nothing Christian in the clinic blockades, the name calling and the physical threats that the anti-choice protesters use routinely to instill fear into those who are pro-choice. They are increasingly desperate when they cannot convince through dialogue and they seem willing to use any means necessary, including physical violence, to shut down the dialogue altogether.

For me and RCAR, this is a "Freedom of Religion" issue, and it is reminiscent of the crusades. Clinic blockaders not only stop a woman from being able to exercise her constitutional rights, they also impose upon that woman a particular religious point of view and deny her the authority over her own soul.

I hope that you can use this.

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